HAZARDOUS WASTE CONTAMINATION OF WATER RESOURCES

(Superfund Clean-up Policy and the Seymour Recycling Case)

(98-79)

HEARINGS

BEFORE THE

SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT

OF THE

COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION HOUSE OF REPRESENTATIVES

NINETY-EIGHTH CONGRESS

SECOND SESSION

MARCH 13, 14, 15, 1984

WITNESSES: OFFICE OF TECHNOLOGY ASSESSMENT; INDUSTRY

Printed for the use of the
Committee on Public Works and Transportation

U.S. GOVERNMENT PRINTING OFFICE
42-590 O WASHINGTON : 1985

H641-33

COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION

JAMES J. HOWARD, New Jersey, *Chairman*

GLENN M. ANDERSON, California
ROBERT A. ROE, New Jersey
JOHN B. BREAUX, Louisiana
NORMAN Y. MINETA, California
ELLIOTT H. LEVITAS, Georgia
JAMES L. OBERSTAR, Minnesota
HENRY J. NOWAK, New York
ROBERT W. EDGAR, Pennsylvania
ROBERT A. YOUNG, Missouri
NICK JOE RAHALL II, West Virginia
DOUGLAS APPLEGATE, Ohio
GERALDINE A. FERRARO, New York
BRIAN J. DONNELLY, Massachusetts
DONALD JOSEPH ALBOSTA, Michigan
RON DE LUGO, Virgin Islands
GUS SAVAGE, Illinois
FOFO I.F. SUNIA, American Samoa
KATIE HALL, Indiana
DOUGLAS H. BOSCO, California
JAMES F. McNULTY, JR., Arizona
JIM MOODY, Wisconsin
ROBERT A. BORSKI, Pennsylvania
JOE KOLTER, Pennsylvania
TIM VALENTINE, North Carolina
EDOLPHUS TOWNS, New York
WILLIAM O. LIPINSKI, Illinois
MICHAEL A. ANDREWS, Texas
TOM J. VANDERGRIFF, Texas
J. ROY ROWLAND, Georgia
JAMES McCLURE CLARKE, North Carolina
ROBERT E. WISE, JR., West Virginia

GENE SNYDER, Kentucky
JOHN PAUL HAMMERSCHMIDT, Arkansas
BUD SHUSTER, Pennsylvania
ARLAN STANGELAND, Minnesota
NEWT GINGRICH, Georgia
WILLIAM F. CLINGER, JR., Pennsylvania
GUY MOLINARI, New York
E. CLAY SHAW, JR., Florida
BOB McEWEN, Ohio
FRANK WOLF, Virginia
THOMAS E. PETRI, Wisconsin
HAL DAUB, Nebraska
LYNN MARTIN, Illinois
VIN WEBER, Minnesota
ROBERT F. (BOB) SMITH, Oregon
DON SUNDQUIST, Tennessee
NANCY L. JOHNSON, Connecticut
RON PACKARD, California

SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT

ELLIOTT H. LEVITAS, Georgia, *Chairman*

ROBERT A. ROE, New Jersey
MICHAEL A. ANDREWS, Texas
J. ROY ROWLAND, Georgia
ROBERT E. WISE, JR., West Virginia
JOHN B. BREAUX, Louisiana
HENRY J. NOWAK, New York
GERALDINE A. FERRARO, New York
DONALD JOSEPH ALBOSTA, Michigan
ROBERT A. BORSKI, Pennsylvania
WILLIAM O. LIPINSKI, Illinois
JAMES J. HOWARD, New Jersey
(Ex Officio)

GUY MOLINARI, New York
NEWT GINGRICH, Georgia
E. CLAY SHAW, JR., Florida
BOB McEWEN, Ohio
DON SUNDQUIST, Tennessee
NANCY L. JOHNSON, Connecticut
GENE SNYDER, Kentucky
(Ex Officio)

CONTENTS

Proceedings of: Page

March 13, 1984 1
March 14, 1984 177
March 15, 1984 1195

TESTIMONY

Atkins, Patrick R., general manager of environmental control and chief environmental engineer, Aluminum Co. of America 1152
Bonczek, Robert R., director of safety, health and environmental affairs, E.I. du Pont de Nemours & Co.; accompanied by Eugene Berman, senior attorney, environmental division 228
Chu, Joseph P., assistant director, plant environment, environmental activities staff of General Motors Corp. accompanied by Leonard F. Charla, attorney, legal staff, General Motors Corp 228
Diver, Jeffrey, vice president and general counsel, Chemical Waste Management, Inc.; accompanied by Raymond W. Bock, director of project development, Environmental Remedial Action Division, Chemical Waste Management, Inc 1196
Harness, Robert L., director, environmental and public affairs, Monsanto Agricultural Products Co 1152
Hedge, Arthur J., vice president, IBM Real Estate & Construction Division 228
Hirschhorn, Joel S., senior associate, Office of Technology Assessment, Washington, DC 4
Jackson, Christopher J., attorney, and Wilbur Sterling, director of manufacturing, Southwind Division, Stewart-Warner Corp 1152
Topol, Allan, outside counsel for IBM, Covington & Burling 228

MATERIAL RECEIVED FOR THE RECORD

Atkins, Patrick R., general manager of environmental control, chief environmental engineer, Aluminum Co. of America: Statement 1156
Bock, Raymond, program director, Superfund activities: .....
Hazardous waste manifest reports 1257
Letter dated March 21, 1983, to Robert Schaefer, Regional Counsel, U.S. Environmental Protection Agency, Region V, re: Drum crushing pad, Seymour Recycling Center—Cleanup, Chemical Waste Management, Inc 1201
Bonczek, Robert R., director of safety, health and environmental affairs, E.I. du Pont de Nemours & Co.:
Statement 344
Letter dated, April 5, 1984, to Subcommittee on Investigations and Oversight, concerning transcriptional errors of the hearing March 14, 1984 373
Cary, Frank T., IBM corporate policy: Notes dated, July 30, 1979, No. 129B; subject: Environmental protection 356
Chemical Waste Management, Inc.: RCRA permitted sites acquired 1232
Chu, Joseph P., Ph.D., P.E., assistant director, plant environment, General Motors Corp.: Letter dated, July 12, 1984, to Subcommittee on Investigations and Oversight, concerning followup letter of April 2, 1984; re: GM's hazardous waste generation data 378
Diver, Jeffrey, vice president, general counsel, Chemical Waste Management, Inc.:
Statement 1228
Supplemental statement 1441

Page

E.I. du Pont de Nemours & Co.:
Attachment B, executive committee, safety, health and environmental quality ... 374
Attachment B, waste management, policy, procedure and implementation ... 375
Eidsness, Frederic A., Jr., Assistant Administrator for Water, EPA: Letters to Frank Krohn, vice president and general counsel, Chemical Waste Management, Inc., concerning extension of the expiration date for research permit Hq81-002 ... 1418
Environmental Protection Agency:
Generator biennial hazardous waste reports for 1983 on General Motors Corp ... 383
Permit No. 81-002, Ocean Dumping Permit Program, Marine Protection, Research, and Sanctuaries Act, notice of change in permit expiration date ... 1392
ERM Midwest, Inc., Columbus, OH: Case study of Seymour Recycling Corp., Seymour, IN, submitted to Office of Technology, U.S. Congress ... 54
Fernandez, Louis Dr., chairman of the board, Monsanto Co., Chemical Manufacturers Association: Statement before the Subcommittee on Commerce, Transportation and Tourism, Committee on Energy and Commerce dated, March 8, 1984 ... 306
Flax, Louis, president, Lopat Enterprises, Inc., Committee on Small Business, Subcommittee on Energy, Environment, and Safety Issues Affecting Small Business: Statement ... 46
General Motors Corp.:
Statement ... 220
Information concerning drums at the sites ... 1146
Harness, Robert L., director, environmental and public affairs, Monsanto Co.: Statement ... 1163
Hedge, Arthur J., Jr., vice president, IBM Real Estate and Construction Division, and Allan Topol, outside counsel for IBM, Covington & Burling, Washington, DC:
IBM statement ... 179
Letter dated, April 3, 1984, to Hon. Elliott H. Levitas, chairman, Subcommittee on Investigations and Oversight, re: Seymour recycling hazardous waste site ... 1194
Hirschhorn, Joel S., senior associate, Office of Technology Assessment: Statement ... 10
IBM corporate facilities practices: Notes dated, February 1983; subject: waste management ... 358
Jackson, J. Christopher, attorney, Stewart-Warner Corp.: Statement ... 1174
Murphy, E.A., General Motors Corp.:
Memo dated, March 10, 1978, to general managers division, general operating officers, et al.; subject: toxic substances control policy ... 368
Memo dated, January 31, 1979, to general managers division, general operating officers, et al.; subject: GM environmental policy ... 370
Ruckelshaus, William D., Administrator, U.S. Environmental Protection Agency: Letter dated February 29, 1984, to Hon. Elliott H. Levitas, chairman, Subcommittee on Investigations and Oversight; concerning statements made by Gene A. Lucero on the Agency's draft settlement policy for future negotiations ... 34
Seymour Recycling Center: Summary of treatment/disposal activities, project completion, January 1984 ... 1377
Sterling, Wilbur, director, South Wind Division: Statement ... 1171
Shufflebotham, Ron T.: Memo dated, March 7, 1984, to officers, region managers, et al., re: Waste Management, Inc. and Subs-Statistical Data ... 1454
Topol, Allan, Convington & Burling, Washington, DC: Letter dated December 10, 1982, to all companies who signed the proposed consent decree in the Seymour matter ... 1206
Transportation companies acquired in Louisiana and Mississippi by WMI and subsidiaries since 1978 ... 1433
Tunstall, D.W., Sr., engineer, General Motors Corp., Arlington, TX: Letter dated June 23, 1984, to Mitch Zdyb, concerning 1983 hazardous wastes ... 661
U.S. District Court of Southern Indiana: Civil action No. IP 80-457-C, affidavit ... 1374
Weiss-Malik, Roberto F., project manager, Canonie Environmental Services Corp.: Letter dated, July 12, 1982, to Allan Topol, Covington & Burling law firm, re: Letter of transmittal report evaluation of site conditions and remedial work requirements, Seymour Recycling Center, Seymour, IN ... 241
Zdyb, M.P., General Motors Corp.: Memo dated, July 12, 1984, to J.P. Chu; subject: Hazardous waste generation data for 1983 ... 381

HAZARDOUS WASTE CONTAMINATION OF WATER RESOURCES

(Superfund Cleanup Policy and the Seymour Recycling Case)

TUESDAY, MARCH 13, 1984

HOUSE OF REPRESENTATIVES,
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,
SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT,
Washington, DC.

The subcommittee met at 10:10 a.m., in room 2253 of the Rayburn House Office Building, Hon. Elliott H. Levitas (chairman of the subcommittee) presiding.

Mr. LEVITAS. The subcommittee will please come to order.

This morning, the Subcommittee on Investigations and Oversight of the Committee on Public Works and Transportation continues with its inquiry into the contamination of our Nation's water resources by improperly and illegally disposed hazardous wastes, and the U.S. Environmental Protection Agency's administration of the 1980 Superfund Law for cleaning up abandoned hazardous waste sites.

Of concern to the subcommittee is whether the current framework of Federal hazardous waste control laws are adequate—whether they will provide both the means and the methods for cleaning up the thousands of hazardous waste sites scattered across the Nation, and whether they will prevent the occurrence of new ones.

Of equal interest to the subcommittee is whether these laws—and the way they are carried out—encourage or discourage the development and use of environmentally safe and effective hazardous waste disposal and recycling technologies.

Early in our review, which is now almost 2½ years old, we found among other things, that many of the thousands of waste sites around the country were not being fully and expeditiously cleaned up, and that some of the responsible companies were not being held fully liable for their share of cleanup costs.

Our efforts to probe deeper into the Superfund Program, as many of you no doubt recall, ran into a road block—the refusal of the EPA, at the Department of Justice's direction to provide the subcommittee with full access to vital enforcement files.

Fortunately, after experiencing a near constitutional crisis, the matter was resolved last year, when the White House and the Justice Department finally provided the subcommittee with total

access to all of the EPA files and documents. Access to those documents made it possible for our oversight investigation to proceed.

Since then, we have focused a considerable portion of our attention on the Seymour Recycling Corp. abandoned hazardous waste site located in Seymour, IN. That site and the efforts to clean it up, as I have noted at previous hearings, has revealed to us almost every aspect of the Superfund Program—the role of EPA and the Justice Department, the role of local and State government and as will be seen during these 3 days of hearings, the role of industry.

At hearings held by the subcommittee last December, we heard testimony from those who live in Seymour. They told us why it was so difficult to get anyone to stop the pollution and the contamination that was occurring and of how they were unable to resolve the public health and environmental problems that confronted them.

We heard about the States efforts—rather ineffective efforts in this instance—to prevent and abate the problems at the Seymour Recycling plant prior to its abandonment. And we heard from EPA and Justice Department officials of the problems that they experienced in attempting to clean up the site, given the inability—or the unwillingness—of the State to provide its share of the matching funds that would have enabled the use of the then new Superfund Law's Trust Fund as intended by Congress.

We now have a better, if albeit partial, understanding of why the Federal Government's efforts to clean up Seymour Recycling languished for almost 2 years; and why, all of a sudden, in the summer of 1982, cleaning up the tens of thousands of rusting and leaking drums of toxic wastes at Seymour became a top priority among certain EPA officials.

Has the surface cleanup truly removed the surface contamination at this site? Is the level and extent of ground water contamination that which was expected, or is it more? Or is it less?

Is the $5.4 million collected from the 180 or so companies that settled with the Government for their full "pro rata" share of the site's estimated $30 million going to be adequate to fully and expeditiously remove or treat the remaining pollution problems? Have the wastes that were removed from the site been disposed of in a fashion that will prevent problems from occurring elsewhere in the future? Was the two-tiered settlement approach, which allowed one group to settle at approximately half the cost of the estimated amount that others have had to contribute a fair and reasonable approach?

And finally, we also look to learn about how it was that so many companies were involved with the Seymour site, 368 according to EPA testimony. What were their policies, practices, and procedures, for disposing of hazardous wastes during the period in which the Seymour recycling corporation was in operation? And have there been new changes since then?

I suspect that the answers to these and the many other questions which we have will come, at least in part, from today's witnesses and those which we will hear from over the next 2 days. And I personally look forward to hearing their testimony.

Following this week of hearings, we will continue with this procedure for review and investigation of the Seymour wastesite, in order to illustrate the problems of the Superfund Program. And

down the line I expect we will hear from, some former EPA and Justice Department officials. And finally, we will conclude by hearing from present high officials at EPA, including the new Administrator, Mr. Ruckelshaus, or someone designated by him in the event he is prevented because of refusal from participating in these hearings.

I might also suggest that the witness on today's agenda from OTA, Dr. Joel S. Hirschhorn, who is the Senior Associate of the Office of Technology Assessment here in Washington, is going to present some very important, critical testimony which I expect will require response from those witnesses who will be testifying after him later this week. And, so, I urge that those witnesses who may be represented here that will be testifying later this week, to pay close attention to Dr. Hirschhorn's testimony, because I think we will be asking a number of questions of them based upon what we will be hearing today.

Before I ask Dr. Hirschhorn to come to the witness table and have the oath administered for his testimony, I would like to find out if my colleague, the gentleman from New York, Mr. Molinari, has an opening statement.

Mr. MOLINARI. Yes, I do, Mr. Chairman, thank you. I also welcome the hearings today and the 2 days which follow, covering the Seymour Recycling Corp. hazardous waste site.

During previous hearings, we've heard from local, State, and Federal witnesses about the problems and solutions to cleaning up this site, and I am very much interested in hearing from both the private sector and from an independent arm of the Congress about the technical aspects of work at Seymour.

Clearly, these hearings will give us a better understanding of the difficulties which the Government faces in dealing with the ground water at any given site. In this site and any other, the question becomes, how clean is clean, in light of technical and resource constraints?

Aside from the adequacy of the surface cleanup at Seymour, one of the more interesting and important questions that needs to be addressed is the phenomenon of shifting drums. In connection with site cleanups, we are beginning to see toxic waste transported to other waste sites which are supposedly secure. I am fearful that all we're really doing is spending a great deal of money to clean up the site when, in fact, what we really are doing is moving a site to a different location, to be cleaned up at some time in the future.

While there are many claims that there are so-called impenetrable layers of geological formations underlying the site, the fact remains that there is no unequivocal assurance that there are not some breaks in these formations. For example, we were assured that a formation underlying the General Dynamics site in Fort Worth, TX, wasn't impermeated; yet, now we are told that the area below is contaminated.

Obviously, the question becomes, "How do we prevent the expansion and creation of hazardous waste sites and discourage the use of landfills as the solution?" Certainly, we need to encourage recycling and incineration as alternatives to simply burying these materials in the ground. I will be very interested to hear from the generators who disposed of waste at Seymour and learn how these

companies are utilizing or developing technologies which will lead us away from land disposal techniques.

Finally, Mr. Chairman, I think one thing has emerged so far in the Seymour site which I think is so important when we look at the national picture. It was stated that there was a possibility that there was no ground water contamination whatsoever. EPA officials had testified that that might have been the case and that those who were settling under the so-called Phase I might have been paying substantially more. I think we both had some doubts about that at the time. I would even go so far as to stick my neck out and predict that when we get the final cost of cleanup, underground water contamination is going to be far in excess of any figures we've heard to date.

Thank you, Mr. Chairman.

Mr. LEVITAS. Thank you, Mr. Molinari.

Mr. Sundquist.

Mr. SUNDQUIST. I have no statement, Mr. Chairman.

Mr. LEVITAS. Dr. Hirschhorn, if you would, come forward, please I have reviewed your testimony, I'd like to say, and I consider it some of the most significant—at the risk of engaging in hyperbole, and I don't think I am—powerful testimony on the subject that I have seen yet. And if it doesn't throw up red flags all over the Environmental Protection Agency and the regulated community, I don't know what can. Because it really exposes a number of myths and assumptions that we have been treated to up to this point.

So, with those remarks, Dr. Hirschhorn, if I may administer to you the oath, would you please raise your right hand:

Do you solemly swear that the testimony you will give before this subcommittee today will be the truth, the whole truth, and nothing but the truth, so help you God?

Mr. HIRSCHHORN. I do.

Mr. LEVITAS. Thank you. You may proceed.

TESTIMONY OF JOEL S. HIRSCHHORN, SENIOR ASSOCIATE, OFFICE OF TECHNOLOGY ASSESSMENT, WASHINGTON, DC

Mr. HIRSCHHORN. Mr. Chairman and committee members, my statement responds to your request for a review of our preliminary findings on our case study of the cleanup of the Seymour Recycling Corp. uncontrolled hazardous waste site in Seymour, IN. This and several other case studies are part of a broader OTA assessment of the national problem of uncontrolled hazardous waste sites addressed by the Superfund Program. We hope to complete the entire study by fall.

Based on our earlier work which resulted in a release 1 year ago of the OTA report, technologies and management strategies for hazardous waste control, it was felt that case studies of uncontrolled sites would illustrate important aspects of the national Superfund Program. In speaking of the Seymour site, therefore, I will also refer to broader national problems and issues which this committee is interested in.

Mr. Chairman, may I assume that the formal statement——

Mr. LEVITAS. Your entire statement will be made a matter of record without objection. But I don't want to discourage you from

providing the subcommittee today orally with as much as you would like to say, because, as I said, Dr. Hirschhorn, your testimony today is so much at variance with what we have heard from officials of the Environmental Protection Agency and others that I find it startling, frankly. So, I don't want to discourage you, but you——

Mr. HIRSCHHORN. I just thought I might skip the beginning history.

Mr. LEVITAS. I think that's fine. I'm tired of hearing the history of Seymour.

Mr. HIRSCHHORN. Let me first summarize, then, our findings from our own case study, just to put it in a certain framework.

First, there is little reason to believe that the recently completed surface cleanups have removed all the contaminated soil or buried hazardous wastes from the Seymour site. Toxic materials that remain will continue to spread deeper into the ground and groundwater. There never was a complete assessment of the extent of soil contamination, nor were any cleanup goals established by EPA. An arbitrary depth of 1 foot for selected locations was agreed to by EPA in its settlement with a group of 24 companies which paid for the surface cleanup. The amount of soil removed was about 15 percent of what previous work for EPA had suggested appropriate. A number of factors make it likely that EPA's ongoing study of the extent of subsurface contamination will confirm substantial groundwater contamination. Several important issues need to be resolved with regard to when and how subsurface cleanup will occur. The Seymour experience illustrates a number of problems with the Federal Superfund Program. These include: no national cleanup goals or standards; implementation of the cost-effectiveness provision in the statute in a way that leads to widespread use of temporary rather than permanent cleanup technologies; and use of land disposal for wastes from cleanup which shifts risks from one community to another and is contributing to the creation of still more uncontrolled sites.

First, I will talk about the effectiveness of the recently completed surface cleanup. While there was a clear need for a surface cleanup at Seymour, it should be realized that the distinction between surface and subsurface cleanup is artificial and presents problems. The initial settlement between EPA and a group of 24 users of the site was greatly facilitated by this arbitrary division. However, the hazardous wastes on the surface of the site have also penetrated into the ground and are, therefore, the cause of any subsurface contamination of ground and ground water. There is no doubt that large quantities of uncontainerized liquid toxic chemicals were present on the land and in surface ponds. Had the National Contingency Plan been in effect at the time of the agreement with the 24 users, a comprehensive surface-subsurface cleanup settlement would have been required.

It is much easier and less expensive to clean up the surface of an uncontrolled site than contaminated soil and polluted groundwater. What exactly does surface cleanup mean? At Seymour, surface cleanup has been interpreted to include the removal of some contaminated soil as well as the removal of hazardous wastes. A major issue that has emerged from OTA's case study is what technical

criteria were used to determine how much soil should be removed. It should be emphasized that if only some portion of the contaminated soil is removed, water entering the site will continue to transport toxic chemicals from contaminated soil into surface water runoffs, as well as deeper into the ground and groundwater. In other words, the more contaminated soil that remains at Seymour, the more toxic chemicals will be dispersed and the more difficult and costlier it will be to clean up the site. Furthermore, some hazardous wastes were apparently buried at Seymour, although burial was not the prevalent practice at the site.

The agreement which EPA entered into for surface cleanup sanctioned removal of only 1 foot of soil from 58 percent of the site for a total of 14,300 cubic yards at a cost of $676,000. However, an earlier reprt for EPA estimated that it was necessary to remove 5 feet of soil from the 13-acre site for a total of 105,000 cubic yards at an estimated cost of $5 million. The 24 generators commissioned a study that supports the removal of about 15 percent of what EPA's contractor thought necessary, but there were apparently no actual data to support this position. OTA has been unable to find any record of data to document the full extent of soil contamination. However, soil was definitely contaminated, because in 1980 an EPA office obtained liquid and soil samples from the site which documented the presence of 41 organic compounds, of which 25 were priority pollutants.

Moreover, EPA did not establish cleanup goals for the surface cleanup. A procedure to determine the effectiveness of contaminated soil removal would include establishing acceptable residual levels of toxic chemicals known to have been on the site. Then soil testing could verify that the remaining soil met the established standards. Without detailed technical data to support it, it appears that the agreement to the limited 1-foot soil removal was dictated chiefly by financial considerations.

It is doubtful that the now completed surface cleanup at Seymour has removed all the contaminated soil. To the contrary, it appears that significant amounts of contaminated soil remain.

This example of a lack of clear cleanup goals is not an isolated case. The National Contingency Plan provides no specific cleanup standards or goals. Site cleanups are handled on a case-by-case basis and, as we have seen at Seymour, cleanup goals, if they are specified at all, are likely to be driven by economic considerations, rather than by analysis of threats to public health. Nationwide, sites with similar types and levels of environmental pollution may not receive similar levels of cleanup.

Second, I'll talk about the ground water problem subsurface cleanup at Seymour.

A major study of Seymour by CH2MHill, an EPA contractor, is underway to determine the extent of ground water contamination and potential remedial action alternatives. However, although a complete understanding must await that report, there is evidence to indicate that serious ground water contamination exists. And I will cite some of this evidence.

A June 1980 report by O.H. Materials, in part based on a preliminary ground water study by K-V Associates which was used for the initial ranking of the site, indicated that ground water con-

tamination might be migrating offsite. Samples from an onsite pond confirmed the presence of five highly toxic chemicals that could have migrated into the ground. The aquifer of concern was noted to be the source of drinking water for over 20,000 people.

For the second and final ranking of the site, two contaminated acquifers were cited in a February 1982 report by Environmental Science and Engineering. A shallow aquifer in sandy soil, at 10 to 25 feet under the field north of the site, contained a number of chemicals which are cited in the formal statement, but they are quite toxic chemicals. And, in fact, vinyl chloride was found at the down-gradient well nearest the site at 1,240 micrograms per liter, which is significantly greater than the standard of 20 micrograms per liter. In a deeper sandy formation, 65 to 75 feet below the surface, another aquifer was found to contain traces of a number of toxic chemicals. Moreover, a downward hydraulic gradient was found to exist between the upper and lower acquifers; that is, the upper acquifer eventually recharges the lower one.

A study by Ecology and Environment completed in February 1982 reported a plume of pollutants moving offsite.

Although the study done for the group of 24 users did not affirm ground water contamination, it did recommend an alternative water supply for the nearby population.

Also, there has been no serious attempt to check the integrity of the sewer leading from the site to the municipal system; and this pathway may have been a source of ground water contamination.

Last, on February 27, 1984, the court overseeing the implementation of the surface cleanup agreement ordered the local water utility to extend the waterline even though water wells were not contaminated, because the direction of ground water flow was known and there was an imminent threat of danger to nearby residents.

The likelihood that contaminated soil remains at the site and the early evidence for ground water contamination make the present work to determine the extent of ground water contamination more important. But if contamination is confirmed, the issue confronting EPA at Seymour, as elsewhere, will be what to do about the pollution. Although action has already been taken to provide an alternative water supply for the smaller of the two nearby communities, this does not necessarily mean that it is feasible to do the same for a population of 20,000 people. The choice may reduce to containment of the plume of contamination versus permanent treatment of the contaminated aquifers. The latter, more expensive alternative would, of course, only make sense if all sources of toxic chemicals remaining at the site, such as contaminated soil and buried wastes, are totally removed.

What we see nationally indicates a reluctance on the part of EPA to commit to the more costly permanent cleanup of contaminated aquifers, rather than to stopgap containment of a plume of pollution or abandonment of an aquifer. In the case of Seymour, the situation is further complicated by the settlement already made which removed all future liability from the group of 24 users. There is not yet a detailed cost estimate for subsurface cleanup at Seymour. About $5 million have been collected thus far from other users, but EPA often refers to an average cost of $7 million just to contain a plume of contamination. The Seymour situation appears

serious and complex, and cleanup costs could be much greater, particularly if large quantities of contaminated soil must be removed and the surface water treatment plant requires spending. A recent study for the Chemical Manufacturers Association indicates that for a site with the type and quantity of toxic wastes such as at Seymour the costs of ground water decontamination range from $20 million to $40 million. Again, I want to emphasize, decontamination, not containment.

Who will pay for the ground water cleanup? Will the uncertainty of funding influence the choice of remedial action? Will the decisions be made soon enough to avoid prohibitive ground water cleanup costs?

Next, I'd like to talk about the issue of permanent versus temporary remedies at Superfund sites.

Seymour illustrates another important issue for the entire Superfund Program. Large amounts of toxic materials have been removed from Seymour and, for the most part, placed in land disposal facilities. From its previous work and ongoing studies, OTA has concluded that land disposal of hazardous wastes cannot assure the long-term protection of public health and the environment. Land disposal technology for hazardous waste is fundamentally flawed and the historical record provides ample evidence of this. While the most toxic wastes will remain dangerous for many decades, perhaps forever, the critical elements of land disposal facilities cannot be assured to function effectively for such long times. Natural and synthetic liners for landfills leak eventually and leachate collection systems will become clogged.

OTA has found serious deficiencies in EPA's regulations for land disposal facilities, and numerous studies have shown poor compliance by facility operators with these regulations. There is, for example, no Federal requirement to fix a leak in a facility which is found to have contaminated a ground water supply; nor to have a leaking facility stop taking in toxic wastes; nor to have that facility provide assurance that it has the funds to fix the leak and clean up the pollution.

What we are witnessing, therefore, with current cleanup approaches seems to be the shifting of toxic materials from one location to another in lieu of more permanent solutions. In an attempt to protect one community from the threats of uncontrolled hazardous waste sites, other communities are being put at risk. The already high costs of cleanup are for temporary band-aid approaches which already are leading to the formation of still more uncontrolled sites whose cleanup will be just as costly.

In the case of Seymour, much of the wastes and contaminated soil were probably deposited at a large landfill in Emelle, AL. In addition to the contaminated soil, these included over 900,000 gallons of bulk materials, about 903,000 gallons of materials from drums, about 50,000 crushed drums, a large amount of sludge from the water treatment plant, and large amounts of materials from the equipment and structures on the site. This site receives vast quantities of hazardous wastes and cleanup materials from all over the Nation. A recent report by the U.S. Geological Survey says the following about this site in Alabama:

A relatively impermeable chalk formation in west-central Alabama is being used as a respository for hazardous wastes and is being considered for additional waste storage. In places where the chalk is fractured, the water resources of the area may become polluted and be a threat to public health.

There appears to be a consistent and widespread use of containment approaches which: First, leave hazardous wastes and contaminated materials at uncontrolled sites, or second, dispose of such materials offsite at operating hazardous waste land disposal facilities. Rarely is a permanent remedy to the problem, such as destruction or detoxification, chosen. The procedures used by EPA and its contractors to determine the cost-effective remedial action as required by statute virtually guarantee that low-cost containment and land disposal options are selected. But these options are really not as low cost as they are assumed to be, because the real long-term costs are being neglected. For example, the probable longer term costs to clean up the sites where the wastes are left, or are brought to, are not taken into account. But history has already demonstrated that it is only a matter of time until leaks occur again.

Moreover, the very concept of cost effectiveness is based on having a fixed goal which various alternatives can meet and then evaluating their costs and choosing the lowest cost-effective option. For the Superfund Program this would mean that cleanup goals are first established on the basis of the risks posed by a particular site. But the Superfund Program, constrained by funds that are pitifully small in comparison to the task it must tackle, has approached the problem differently. First, the amount of money that can be spent is determined; then cleanup options are considered and generally expensive, permanent solutions are quickly ruled out; and, finally, the extent of cleanup is determined.

However, the seemingly more expensive cleanup solutions are really cheaper in the long term. But in its Superfund Program, EPA has provided little support for using waste treatment alternative to land disposal. In a memorandum sent to me recently by one of EPA's major Superfund contractors the following appeared:

Nonproprietary processes are preferred to Superfund, since this avoids sole source procurement problems if the technology is later implemented. If and when a proprietary process has special technical merit for this program, EPA will have to consider CERCLA policy issues related to such matters and balance them against special technical merits.

What this statement seems to imply is that new innovative cleanup technologies—high-tech solutions versus land disposal—which are almost certainly proprietary are being locked out of the system. As part of OTA's ongoing assessment, we have discovered many innovative technologies and many companies who want to enter the cleanup business. American inventiveness and entrepreneurs stand ready to help solve a major national problem of staggering dimensions. But until we recognize the true long-term cost effectiveness and protection afforded by permanent cleanup technologies, high-tech solutions will not be used. OTA has discussed this issue for the question of how to manage the large amounts of dioxin contaminated soil in Missouri in a recent staff memorandum.

Finally, I would like to talk about some State and community issues.

The events at Seymour illustrate a number of issues confronting States and communities. Seymour serves as a classic example of why direct remedial action under the Federal Superfund Program may be prevented when States cannot provide the 50-percent match for cleanup costs at publicly owned sites. Indeed, States often have a problem in providing even the 10-percent match for privately owned uncontrolled sites. How much money a State has available can play a critical role in determining the type of cleanup chosen. On the other hand, Seymour also illustrates the problem of using an enforcement and settlement approach which, for the most part, excludes the State. There has been and there continues to be limited interaction between Indiana and EPA on Seymour. For example, State officials believed there was a need to check more extensively for offsite soil contamination, but this was never done or considered for the Surface Cleanup Program. No provisions have been made for long-term operation and monitoring of the surface wastewater treatment system which feeds into the municipal system, nor for long-term monitoring of the site itself. The State appears to take the position that it lacks the personnel and resources to deal with the continuing responsibilities at the site.

With regard to the local community, the following factors should be noted:

There was one public meeting in November 1982 prior to initiation of the cleanup. The meeting was not well attended, and there was no request for input from the public. At the meeting EPA said that routine reports would be given to the public, but none were ever published.

Second, no community task force was ever established in Seymour to monitor the project, although the League of Women Voters attempted to help keep the cleanup issue alive and in front of the community.

Third, there was no mechanism to provide independent technical expertise for the public so that they could better discuss and pose significant questions.

Next, although the local chamber of commerce were kept well informed, their meetings were closed to the public.

The mayor of Seymour felt that the Government's Public Participation Program was of little value.

If the public's confidence in Government programs designed to protect them from hazardous waste is to be restored, then there is a clear need to improve the effectiveness of the public participation component of the Superfund Program. There is also a need to explore ways to improve Federal, State, local government relationships.

That is my formal statement.

[The statement of Mr. Hirschhorn follows:]

STATEMENT OF JOEL S. HIRSCHHORN, SENIOR ASSOCIATE, OFFICE OF TECHNOLOGY ASSESSMENT

Mr. Chairman and committee members, my statement responds to your request for a review of our preliminary findings on our case study of the cleanup of the Seymour Recycling Corporation uncontrolled hazardous waste site in Seymour, Indiana.

This and several other case studies are part of a broader OTA assessment of the national problem of uncontrolled hazardous waste sites addressed by the Federal Superfund program. We hope to complete the entire study by fall. Based on our earlier work, which resulted in the release one year ago of the OTA report TECHNOLOGIES AND MANAGEMENT STRATEGIES FOR HAZARDOUS WASTE CONTROL, it was thought that case studies of uncontrolled sites could illustrate important aspects of the national Superfund program. In speaking of the Seymour site, therefore, I willl also refer to broader national problems and issues which your committee is interested in.

SUMMARY

The Seymour site.—After acquiring two incinerators, which never functioned very well, waste processing began in 1970 and reached a peak in 1974. The state of Indiana started receiving complaints in 1972 and filed a lawsuit to cleanup the site in 1978. In early 1980, operations ceased. The owner, now the Environmental Processing Corp., declared bankruptcy, and the Environmental Protection Agency (EPA) began emergency actions under Section 311 of the Clean Water Act. Soon after, two waste generators removed their wastes offsite. From 1980 through 1982, there were additional surface cleanups, a number of studies took place, and through its ranking for the National Priority List as part of the Superfund program the site became the highest priority uncontrolled site in Indiana. In the Fall of 1982, EPA signed an agreement with 24 users of the site by which they would pay for a total surface cleanup but would be free of all further liabilities at the site. By early 1984, the surface cleanup was completed, EPA had taken action against other users of the site, and a major study was initiated under Superfund to determine the nature and extent of subsurface contamination and its cleanup.

OTA's case study.—There is little reason to believe that the recently completed surface cleanup has removed all the contaminated soil or buried hazardous wastes from the Seymour site. Toxic materials that remain will continue to spread deeper into the ground and groundwater. There never was a complete assessment of the extent of soil contamination, nor were any cleanup goals established by EPA. An arbitrary depth of one foot for selected locations was agreed to by EPA in its settlement with a group of 24 companies which paid for the surface cleanup. The amount of soil removed was about 15 percent of what previous work for EPA had suggested appropriate. A number of factors make it likely that EPA's ongoing study of the extent of subsurface contamination will confirm substantial groundwater contamination. Several important issues need to be resolved with regard to when and how subsurface cleanup will occur. The Seymour experience illustrates a number of problems with the Federal Superfund program. These include: no national cleanup goals or standards; implementation of the cost-effectiveness provision in the statute in a way that leads to widespread use of temporary rather than permanent cleanup technologies; and use of land disposal for wastes from cleanup which shifts risks from one community to another and is contributing to the creation of still more uncontrolled sites.

THE EFFECTIVENESS OF THE SURFACE CLEANUP

While there was a clear need for a surface cleanup at Seymour, it should be realized that the distinction between surface and subsurface cleanup is artificial and presents problems. The initial settlement between EPA and a group of 24 users of the site was greatly facilitated by this arbitrary division. However, the hazardous wastes on the surface of the site have also penetrated into the ground and are, therefore, the cause of any subsurface contamination of gound and groundwater. There is no doubt that large quantities of uncontainerized liquid toxic chemicals were present on the land and in surface ponds. Had the National Contingency Plan been in effect at the time of the agreement with the 24 users, a comprehensive surface-subsurface cleanup settlement would have been required.

It is much easier and less expensive to clean up the "surface" of an uncontrolled site than contaminated soil and polluted groundwater. What exactly does surface cleanup mean? At Seymour, surface cleanup has been interpreted to include the removal of some contaminated soil as well as the removal of hazardous wastes. A major issue that was emerged from OTA's case study is what technical criteria were used to determine how much soil should be removed. It should be emphasized that if only some portion of the contaminated soil is removed, water entering the site will continue to transport toxic chemicals from contaminated soil into surface water runoffs, as well as deeper into the ground and groundwater. In other words, the more contaminated soil that remains at Seymour, the more toxic chemicals will be

dispersed and the more difficult and costlier it will be to clean up the site. Furthermore, some hazardous wastes were apparently buried at Seymour, although burial was not the prevalent practice at the site.

The agreement which EPA entered into for surface cleanup sanctioned removal of only one foot of soil from 58 percent of the site for a total of 14,300 cubic yards at a cost of $676,000. However, an earlier report for EPA estimated that it was necessary to remove five feet of soil from the 13 acre site for a total of 105,000 cubic yards at an estimate cost of $5,000,000. The 24 generators commissioned a study that supports the removal of about 15 percent of what EPA's contractor throught necessary, but there were apparently no actual data to support this position. OTA has been unable to find any record of data to document the full extent of soil contamination. However, soil was definitely contaminated, because in 1980 an EPA office obtained liquid and soil samples from the site which documented the presence of 41 organic compounds, of which 25 were priority pollutants.

Moreoyer, EPA did not establish cleanup goals for the surface cleanup. A procedure to determine the effectiveness of contaminated soil removal would include establishing acceptable residual levels of toxic chemicals known to have been on the site. Then soil testing could verify that the remaining soil met the established standards. Without detailed technical data to support it, it appears that the agreement to the limited one foot soil removal was dictated chiefly by financial considerations.

It is doubtful that the now completed surface cleanup at Seymour has removed all the contaminated soil. To the contrary, it appears that significant amounts of contaminated soil remains.

This example of a lack of clear cleanup goals is not an isolated case. The National Contingency Plan provides no specific cleanup standards or goals. Site cleanups are handled on a case-by-case basis and, as we have seen at Seymour, cleanup goals—if they are specified at all—are likely to be driven by economic considerations, rather than by analysis of threats to public health. Nationwide, sites with similar types and levels of environmental pollution may not receive similar levels of cleanup.

THE GROUND WATER PROBLEM AND SUBSURFACE CLEANUP

A major study of Seymour by CH2MHill, and EPA contractor, is underway to determine the extent of ground water contamination and potential remedial action alternatives. However, although a complete understanding must await that report, there is evidence to indicate that serious ground water contamination exists:

A June, 1980 report by O.H. Materials, in part based on a preliminary groundwater study by K-V Associates (which was used for the initial ranking of the site) indicated that groundwater contamination might be migrating offsite. Samples from an onsite pond confirmed the presence of five higly toxic chemicals that could have migrated into the ground. The aquifer of concern was noted to be the source of drinking water for over 20,000 people.

For the second and final ranking of the site, two contaminated aquifers were cited in a February, 1982 report by Environmenal Science and Engineering. A shallow aquifer in sandy soil, at 10 to 25 feet under the field north of the site, contained trichlorthane, methyl bromide, chloroform, benzene, trans 1,2-dichloroethylene, vinyl chloride, ethyl benzene, phthalates, and trace levels of dozens of other organic compounds. Vinyl choride was found at the downgradient well nearest the site at 1,240 ug/1, which is significantly higher than the standard of 20 ug/1. In a deeper sandy formation, 65 to 75 feet below the surface, another aquifer was found to contain traces of phenol, phthalats, vinyl chloride, and chloroform. Moreover, a downward hydraulic gradient was found to exist between the upper and lower acquifers; that is, the upper aquifer eventually recharges the lower aquifer.

A study by Ecology and Environment completed in February, 1982 reported a plume of pollutants moving offsite.

Although the study done for the group of 24 users did not affirm groundwater contamination, it did recommend an alternative water supply for the nearby population.

There has been no serious attempt to check the integrity of the sewer leading from the site to the municipal system; this pathway may have been a source of groundwater contamination.

On February 27, 1984 the court overseeing the implementation of the surface cleanup agreement ordered the local water utility to extend the waterline even though water wells were not contaminated, because the direction of groundwater flow was known and there was an imminent threat of danger to nearby residents.

The likelihood that contaminated soil remains at the site and the early evidence for groundwater contamination make the present work to determine the extent of

groundwater contamination more important. But if contamination is confirmed, the issue confronting EPA at Seymour, as elsewhere, will be what to do about the pollution. Although action has already been taken to provide an alternative water supply for the smaller of the two nearby communities, this does not necessarily mean that it is feasible to do the same for a population of 20,000 people. The choice may reduce to containment of the plume of contamination versus permanent treatment of the contaminated aquifers. The latter, more expensive alternative would, of course, only make sense if all sources of toxic chemicals remaining at the site, such as contaminated soil and buried wastes, are totally removed.

What we see nationally indicates a reluctance on the part of EPA to commit to the more costly permanent cleanup of contaminated aquifers, rather that to stopgap containment of a plume of pollution or abandonment of an aquifer. In the case of Seymour, the situation is further complicated by the settlement already made which removed all future liability from the group of 24 users. There is not yet a detailed cost estimate for subsurface cleanup at Seymour. About $5 million have been collected thus far from other uses, but EPA often refers to an average cost of $7 million just to contain a plume of contamination. The Seymour situation appears serious and complex, and cleanup costs could be much greater, particularly if large quantities of contaminated soil must be removed and the surface water treatment plant requires spending. A recent study for the Chemical Manufacturers Association indicates that for a site with the type and quantity of toxic wastes such as Seymour the costs of groundwater decontamination range from $20 million to $40 million. Who will pay for the groundwater cleanup? Will the uncertainty of funding influence the choice of remedial action? Will the decisions be made soon enogh to avoid prohibitive groundwater cleanup costs?

PERMANENT VERSUS TEMPORARY REMEDIES

Seymour illustrates another important issue for the entire Superfund program. Large amounts of toxic materials have been removed from Seymour and, for the most part, placed in land disposal facilities. From its previous work and ongoing studies, OTA has concluded that land disposal of hazardous wastes cannot assure the long-term protection of public health and the environment. Land disposal technology for hazardous waste if fundamentally flawed and the historical record provides ample evidence of this. While the most toxic wastes will remain dangerous for many decades—perhaps forever—the critical elements of land disposal facilities cannot be assured to function effectively for such long times. Natural and synthetic liners for landfills leak eventually and leachate collection systems will become clogged.

OTA has found serious deficiencies in EPA's regulations for land disposal facilities, and numerous studies have shown poor compliance by facility operators with these regulations. There is, for example, no Federal requirement to fix a leak in a facility which is found to have contaminated a groundwater supply; nor to have a leaking facility stop taking in toxic wastes; nor to have that facility provide assurance that is has the funds to fix the leak and clean up the pollution.

What we are witnessing, therefore, with current cleanup approaches seems to be shifting of toxic materials from one location to another in lieu of more permanent solutions. In an attempt to protect one community from the threats of uncontrolled hazardous wastes sites, other communities are being put at risk. The already high costs of cleanup are for temporary "band-aid" approaches which already are leading to the formation of still more uncontrolled sites whose cleanup will be just as costly.

In the case of Seymour, much of the wastes and contaminated soil were probably deposited at a large landfill in Emelle, Alabama. In addition to the contaminated soil, these included over 900,000 gallons of bulk materials, about 903,000 gallons of materials from drums, about 50,000 crushed drums, a large amount of sludge from the water treatment plant, and large amounts of materials from the equipment and structures on the site. This site receives vast quantities of hazardous wastes and cleanup materials from all over the nation. A recent report by the U.S. Geological Survey says the following about this site:

A relatively impermeable chalk formation in west-central Alabama is being used as a repository for hazardous wastes and is being considered for additional waste storage. In places where the chalk is fractured, the water resources of the area may become polluted and be a threat to public health. (National Water Summary 1983—Hydrologic Events and Issues)

There appears to be a consistent and widespread use of containment approaches which (a) leave hazardous wastes and contaminated materials at uncontrolled sites, or (b) dispose of such materials offsite at operating hazardous waste land disposal

facilities. Rarely is a permanent remedy to the problem, such as destruction or detoxification, chosen. The procedures used by EPA and its contractors to determine the cost-effective remedial action as required by statute virtually guarantee that low cost containment and land disposal options are selected. But these options are really not as low cost as they are assumed to be, because the real long-term costs are being neglected. For example, the probable longer-term costs to clean up the sites where the wastes are left, or are brought to are not taken into account. But history has already demonstrated that it is only a matter of time until leaks occur again.

Moreover, the very concept of cost-effectiveness is based on having a fixed goal which various alternatives can meet and then evaluating their costs and choosing the lowest cost-effective option. For the Superfund program this would mean that cleanup goals are first established on the basis of the risks posed by a particular site. But the Superfund program, constrained by funds that are pitifully small in comparison to the task it must tackle, has approached the problem differently. First, the amount of money that can be spent is determined; then cleanup options are considered (generally expensive, permanent solutions are quickly ruled out); and then the extent of cleanup is determined.

However, the seemingly more expensive cleanup solutions are really cheaper in the long-term. But in its Superfund program EPA has provided little support for using waste treatment alternatives to land disposal. In a memorandum sent to me recently by one of EPA's major Superfund contractors the following appeared: "Nonproprietary processes are preferred for Superfund since this avoids sole source procurement problems if the technology is later implemented. If and when a proprietary process has special technical merit for this program, EPA will have to consider CERCLA [Superfund] policy issues related to such matters and balance them against special technical merits."

What this statement seems to imply is that new innovative cleanup technologies—high-tech solutions versus land disposal—which are almost certainly proprietary are being locked out of the system. As part of OTA's ongoing assessment we have discovered many innovative technologies and many companies who want to enter the cleanup business. American inventiveness and entrepreneurs stand ready to help solve a major national problem of staggering dimensions. But until we recognize the true long-term cost-effectiveness and protection afforded by permanent cleanup technologies, high-tech solutions will not be used. OTA has discussed this issue for the question of how to manage the large amounts of dioxin contaminated soil in Missouri in a recent staff memorandum.[1]

STATE AND COMMUNITY ISSUES

The events at Seymour illustrate a number of issues confronting states and communities. Seymour serves as a classic example of why direct remedial action under the Federal Superfund program may be prevented when states cannot provide the 50 percent match for cleanup costs at publicly owned sites. Indeed, states often have a problem in providing even the 10 percent match for privately owned uncontrolled sites. How much money a state has available can play a critical role in determining the type of cleanup chosen. On the other hand, Seymour also illustrates the problem of using an enforcement and settlement approach which, for the most part, excludes the state. There has been and there continues to be limited interaction between Indiana and EPA on Seymour. For example, state officials believed there was a need to check more extensively for offsite soil contamination, but this was never done or considered for the surface cleanup program. No provisions have been made for long-term operation and monitoring of the surface wastewater treatment system which feeds into the municipal system, nor for long-term monitoring of the site itself. The state appears to take the position that it lacks the personnel and resources to deal with the continuing responsibilities at the site.

With regard to the local community, the following factors should be noted:

There was one public meeting in November, 1982 prior to initiation of the cleanup. The meeting was not well attended, and there was no request for input from the public. At the meeting EPA said that routine reports would be given to the public but none were ever published.

No community task force was ever established in Seymour to monitor the project, although the League of Women Voters attempted to help keep the cleanup issue alive and in front of the community.

---

[1] "OTA Review of the Missouri Dioxin Task Force Recommendation Concerning the Management of Contaminated Soil," OTA staff memorandum, December, 1983.

There was no mechanism to provide independent technical expertise for the public so that they could better discuss and pose significant questions.

Although the local Chamber of Commerce were kept well informed, their meetings were closed to the public.

The Mayor of Seymour felt that the government's public participation program was of little value.

If the public's confidence in government programs designed to protect them from hazardous waste is to be restored, then there a clear need to improve the effectiveness of the public participation component of the Superfund program. There is also a need to explore ways to improve Federal-state-local government relationships.

Mr. LEVITAS. Thank you very much, Dr. Hirschhorn.

Again, if your testimony doesn't sound a clarion call and wake us from our slumbers and lethargy, then I don't know what can.

Cutting through the very technical—not very technical but somewhat technical—phraseology of your report as it necessarily must be, what I see in here is that the assumptions that we have now in the Superfund Program or in the NCP—the National Contingency Plan—are such that even if these plans and policies were being used in dealing with the problems of these abandoned hazardous waste sites or these orphaned hazardous waste sites, that we are kidding ourselves and we're talking about a tremendously important public health and economic problem for thousands of communities around America.

Mr. HIRSCHHORN. I agree. I was trained originally as an engineer, and I often point out the analogy: The lack of cleanup goals in the NCP is like somebody going to a builder and saying "build me a house" without telling them how many rooms you want or anything else. The idea of just having some very loose language in the NCP about cleanup and not specifying cleanup goals really doesn't give very clear direction to anyone involved in the cleanup program.

Mr. LEVITAS. I have a number of questions, but I am going to try to limit myself on the first round to just a few, because I know my colleagues on the committee have some important questions they would like to ask as well, and I want to share the opportunity with them this morning.

On page 3 of your testimony, you say: "Had the National Contingency Plan been in effect at the time of the agreement with the 24 users, a comprehensive surface-subsurface cleanup settlement would have been required." I would like for you to expand on that and relate it to one or two things in addition to any other observations you would like to make.

No. 1, would this, would your statement, have been correct notwithstanding the fact that Seymour was not treated as a Superfund site because the State was unwilling to come up with its matching share?

And second, does this mean that if there had been a national contingency plan that would have been applicable, that EPA could not, would not, or should not have entered into the two-tier settlement that was reached at the Seymour site?

Mr. HIRSCHHORN. First, I would say that EPA has shown its ability to interpret the NCP in an extremely flexible way, so that there is no guarantee or assurance that it necessarily would have been interpreted differently. But I think the NCP provides at least a framework for cleanup that would make it difficult to create this

artificial distinction between surface and subsurface cleanup, particularly with regard to removing liability—future liability—of those who enter into such an agreement. I think the national contingency plan does deal a little bit more comprehensively, admittedly though in very loose language, with total cleanup and removal and protection of public health and the environment. So, I don't think it is a guarantee, but I think it would have helped.

Mr. LEVITAS. As we began to examine the documents that we finally wrested from the EPA during that constitutional crisis last year, and we finally began to look at them, as I looked at those documents that related to the Seymour site, one thing that struck me perhaps more than anything else is that the professionals at EPA consistently said, "If you make a settlement, don't make a two-tiered settlement which would release a group of settling parties from contingent liability." This was said down the line consistently." And then, all of a sudden, we saw a settlement which ignored that consistent advice. Would you comment on that?

Mr. HIRSCHHORN. Yes. I would say that, really, any technical person or, really, almost any lay person with common sense, would realize that any hazardous wastes that were on the surface in any sense had to be the contributing factor to subsurface ground water contamination. So, this distinction between surface and subsurface cleanup is really artificial and almost absurd, expecially if one thinks of removing future liability in the first place. I'm not saying that from an engineering perspective that one may not have several phases to cleanup, but it certainly does not seem to be reasonable to look at this settlement as if there were some sort of impermeable barrier between the surface and subsurface. In fact, because the surface cleanup included removal of contaminated soil, by that very fact it seems to negate the simplistic, absurd assumption of surface different than subsurface. I mean, what is surface and what is subsurface? They have removed some material—you know, some soil—from the site, so that clearly is subsurface, it seems to me.

Mr. LEVITAS. Well, subsurface, as you point out, begins at some point approaching infinity below the surface and extends, presumably, "to China." And, you know, where that line is between surface and subsurface, for the purposes of cleanup, is something—as you point out, and I'm sure some of my colleagues will explore more thoroughly—something you don't know in advance. And at this particular site, we don't know; is that correct?

Mr. HIRSCHHORN. I think that is a very important fact, that actions have been taken at Seymour, and this is not an isolated case, without some prior determination of the extent of the problem, and also some prior establishment of exactly what the objectives of that cleanup are. Rather we see at Seymour what only can be called rather arbitrary things agreed to by the EPA with the companies such as 1 foot. You know, 1 foot is a very round number, but it doesn't seem to be a reassurable number, it doesn't seem to be based on a technical set of criteria.

Mr. LEVITAS. It might have even been more appropriate, under the new move toward the metric system, to say 1 meter, perhaps.

Mr. HIRSCHHORN. A few years hence it might have been.

Mr. LEVITAS. It might have been arbitrary, but at least it would put us on the cutting edge to make us consistent.

My last question is this—and then I will recognize the gentleman from New York. Let me give you the other side of the coin; and I'm sure that they will more effectively state their case than I will at this juncture, but I want you to comment on it.

The argument is this: "Look, Superfund was not applicable here because Indiana was unwilling to come up with its 50 percent." You had this terrible situation out there—rusting, leaking drums spraying their poisons out into the soil, toxins getting into the water. We've heard the citizens who live nearby talking about how it was affecting their health and their quality of life and nothing was being done. EPA said, "Superfund doesn't apply. I guess we can go into court, but we'll be in court from now until next year, especially coming up against all that high-powered legal talent of some of your largest corporations of America."

Then they came out and said, "Listen, we'll get the stuff off of there, we'll put some money up, we'll clean off these drums. And we were able to do it in a short timeframe. Wasn't that the best thing to do?" I mean, you know, here you had this lumbering, hulking, whimpering, Gulliver called "Government" against these great corporations of America saying, "Look, we did what we thought was right to begin with, it was legal at the time. We are prepared as good public citizens to come forward and clean this up but in return for that we want a release of liability.

EPA says, "If we don't do that, that stuff will be sitting there on March 13, Super Tuesday, 1984."

How do you respond to that?

Mr. HIRSCHHORN. Well, you know, first of all, I'm not a lawyer; I'm happy about that. [Laughter.]

Mr. LEVITAS. Before you say that, you reminded me—I am a lawyer—or was a lawyer—and certainly I was for a number of years and I still may be—the question that I ask you—then you can say I'm not a lawyer. My question is: Had there been a tougher, more vigorous, aggressive lawyer involved on behalf of the Government, who was prepared to look at not just civil but other remedies as well, would there have been an opportunity to get greater cooperation from the potential responsible parties?

Mr. HIRSCHHORN. I have, really, two answers to your question in point. First, I agree with your last observation. I would have thought that the Federal Government, understanding that it represents the public good, would not have entered into that kind of agreement that would have exempted those parties from all future liability, because, again, it was simply that all the technical information available to EPA certainly indicated that there would be future liability.

But I want to make a second point, and this is more difficult for people to understand. If there's any one word that might characterize the EPA Superfund Program it's inconsistency. Certainly, you can see other sites around the country where EPA has gone in and under the guise of emergency actions, which is quite appropriate under Superfund, they have gone in and, by the way, in some cases repeatedly at sites over a long period of time, and taken emergency

removal action which took the waste off the site. So, there was another alternative, it seems to me.

I think the statute provides a rather large amount of flexibility and opportunity for EPA, if they wish to, to act in behalf of the public good rather quickly. And I think that was another possibility at Seymour. I think Seymour is a complicated site, but again, it is now, in a sense, part of the Superfund Program, the Superfund moneys are being spent, contractor studies, et cetera, are going on, what is consistent with other things going on in the Superfund.

Mr. LEVITAS. Do you consider what has cccurred at Seymour—do you consider what has occurred at Seymour to be a success or a failure in terms of the Superfund Program?

Mr. HIRSCHHORN. Unfortunately, I would say it is a failure from the longer term perspective. So much of what we see going on at Superfund is sort of penny-wise and pound-foolish, it looks good from a very short-sighted perspective, then once you think about it a while you realize that in terms of risk to public health and the environment, and particularly in terms of economic and dollars, it does not make sense from a longer term perspective.

So, no one will deny the need to deal with that surface problem at Seymour. The question is, is the money well spent? And if we're shifting waste, by the way, from one location in the country to another community, this is a problem. And I have raised this often with EPA people, and they just do not seem to have taken a sort of general systems perspective that nothing in the statute says you ought to sacrifice the risk of one community against another; you shouldn't trade those off, essentially. The goal should be to protect all the people of the United States, so it doesn't make sense to move the waste from a site such as Seymour and put it in land disposal sites that will probably leak in the future and then put other communities at risk.

And I think what we see around the country, by the way, is now this tension, particularly in the case of Missouri, most frequently the tension being created pitting one community against another.

Mr. LEVITAS. Thank you very much, Dr. Hirschhorn. I'll be back to you with some more questions.

Mr. Molinari.

Mr. MOLINARI. Thank you, Mr. Chairman.

Let me start off by expressing my deep concern. There was a time, really, in these hearings, when I thought that maybe the right decisions had been made at this site, given the circumstances that existed at the time. I told this to the chairman before, and I think I owe him an apology, because I didn't have the same concerns at the time that he did. Your statement, which makes some very serious charges, in my judgment, amounts to an indictment of the policies of EPA and the settlement that was reached there. I have no reason to doubt your findings.

Could you please, for the sake of the record, share with us how this report was gathered, who was responsible for preparing the background data for the assessment you've given today?

Mr. HIRSCHHORN. Yes. We actually have a number of case studies going on at various sites around the country, and we are using engineering consulting firms to assist us. That is the standard procedure at OTA. The company that worked on the Seymour site is a

company that's called E.R.M.-Midwest, which is located in Columbus, OH. And we have worked with them over a number of months on the site.

Mr. MOLINARI. There are consultants that have been hired by OTA, and they've come up with one finding, and there are consultants that have been hired by the settlors that have come up with a much different picture. Which one are we supposed to believe and why?

Mr. HIRSCHHORN. I am sympathetic with your plight. Again, it's what we see all over the place. I would say, really, in the case of Seymour, that we—that's why I cited in my statement a number of results from different studies, because I think there is a clear pattern to the studies—the studies really extended over a period of years, some of which were worked on by EPA, a technical arm of EPA, in fact. I think the pattern is clear. Now, you may find differences. There was one study done for the group of 24 which, quite frankly, does not impress us as a high quality study, a self-serving kind of study, and it was dismissed by various EPA and State officials; even, they say, they did not take it into account when they entered into the agreement. But I think a pattern is clear although there are differences. You know, there are a handful of studies which seem to indicate, for example, ground water contamination, including some very early samples taken by EPA, itself, with their own results.

I think a pattern is clear. I'm not denying that there is still a need, for example, to do much more extensive work on the extent of ground water contamination and, by the way, on surface contamination. But we have seen this again before at many other sites, including Love Canal where we also did a case study. But there often is a lack of high quality, detail work that guides the cleanup efforts.

Mr. MOLINARI. Let me stop you there for a minute.

In high quality cleanup work, what importance would air-sampling tests be? Would that be part of the picture?

Mr. HIRSCHHORN. Yes. In fact, I have not mentioned it in my formal testimony, but the work done on Seymour for us is really larger and more extensive than my statement today indicates. I'm glad you brought that up. In fact, one of the first issues that came up in the case study at Seymour had to do with air pollution. And there is a controversy over whether or not there was, in fact, evaporation, you might say, of toxic components into the air. There was early evidence—some indication I should say, maybe, not hard evidence—that there was a problem of toxics in the air.

We discovered as a result, quite frankly, of the Seymour study, that the procedures used by EPA to deal with air pollution at Superfund sites is, in fact, the most difficult, the worst one. There are three routes of exposure that EPA deals with in its evaluation of the Superfund sites: that's surface water, ground water and air. And we have discovered, as a result of this study actually, that there is a major problem nationally in how the regions of EPA and the States evaluate the air route for exposure.

Mr. MOLINARI. Let's talk about Seymour.

Mr. HIRSCHHORN. At Seymour, again, there was some indication that there was perhaps an air problem, but there really never was

a kind of extensive testing. Now, there was some testing, but the testing did not reveal an air problem. But air, by its very nature, presents an experimental problem; that is, unless you have continuous monitoring over some period of time to establish original background levels and also to detect toxics in the air which may not be there all the time—they may come up off the ground under various climatic conditions—unless you pursued the detection of air pollution, you may not find it. As I often say to people, you can't find what you don't look for.

I wouldn't rule out this problem of air pollution. The State officials, by the way, in Indiana were concerned that when the incinerators were operating at Seymour, that very likely there had been emissions of toxic materials which then settled on the ground. And my comment in the testimony about the concern of the State about more surface contamination actually stems from their concern that while the incinerators were operating, there were emissions into the air, and what happens is those emissions settle in surrounding areas. And the State officials, I believe, feel that there be more surface contamination outside the perimeter of the site itself, and that has not been looked for, really, in great detail.

Mr. MOLINARI. If I understand you correctly, Doctor, are you saying that the air sampling done by EPA or the consultants was inadequate?

Mr. HIRSCHHORN. I would say so. It looks that way. And, again, it is a more difficult technical problem than even testing for a simple surface contamination. You really have to spend a large effort to deal with that air problem.

Mr. MOLINARI. On page 2 of your testimony, you state that "there never was a complete assessment of the extent of soil contamination nor were there any cleanup goals established by EPA." How did you come to the conclusion that there never was a complete assessment of soil contamination?

Mr. HIRSCHHORN. Well, again, in terms of all the studies—I know there appear to be a lot of studies, there were—it takes a great deal of effort to carry out a sophisticated sampling study to determine the extent of something like soil contamination. That is, you are dealing, really, literally, in three dimensions: You have to look over a certain area, and you have to go down to various depths, and you have to look very extensively for contamination. As you probably have heard the term, there may be "hot spots" of contamination. The way things are done at these sites, you don't have a nice uniform disposal of hazardous waste, you don't have a nice uniform leaking of drums or anything like that; things are very nonuniform.

Mr. MOLINARI. Isn't there technology in place where you can pinpoint these "hot spots"?

Mr. HIRSCHHORN. Oh, yes. But it costs a great deal of money to carry out a good sampling program on a fairly large amount of acreage. It can be done. Again, this is a standard procedural problem in the evaluation of any uncontrolled site. If I take a few measurements over several acres, I may not find much contamination, but I may have missed all the "hot spots." You sort of have to think of hills and valleys of toxic contamination. And you have to

look pretty close, you have to have sort of a good network to detect all possible contamination.

Again, you don't find what you don't look for. So, we have, again, seen this as a consistent problem at other sites, also.

Mr. MOLINARI. Let me try to zero in on what I'm looking for. We mentioned before that apparently there was an arbitrary figure of one foot determined as that which settlors in Phase I would remove. Isn't there any technical evidence available that you looked at to suggest that there were soil samplings taken at different strata and that one foot was determined to be the area that contained the contamination problem?

Mr. HIRSCHHORN. I would say no. I would say that there does not seem to be sufficient evidence to indicate that you could come to that conclusion. Again, the logic, the way you would normally do this, is also demand, have upon removal of some amount of soil, that you would do a test, an actual test, on what remained at that level to confirm that, indeed, at that particular location, you have not left a residual amount of toxic chemicals. So, there is a way of doing sampling initially to sort of lay out a plan of attack for cleanup. But I think, just as important, there has to be an experimental way of confirming, after the removal, as part of that removal process, that what you have left on the surface is, in fact, clean soil, and if you haven't left clean soil, that you, indeed, might have to go down deeper.

I would say to you that, really, setting any depth in inches, feet, or meters, whatever, is really a naive approach that a technical person would not find acceptable.

Mr. MOLINARI. Well, then, even if they went the full 5 feet, are you telling us that you wouldn't find that acceptable?

Mr. HIRSCHHORN. I would say to you only if that were also matched with a cleanup goal in terms of what residual amounts of toxic chemicals were acceptable. The 5-feet approach or any depth approach is the kind of thing that, again, attorneys like when they make a settlement. But I would say to you that a more flexible approach has to be made where you establish concentration levels that are acceptable for the toxic chemicals. The contract which requires you take a sample, you may start out at 1 foot, or 5 feet, or whatever, but then sampling would have to be done to confirm that the soil left is clean soil, not contaminated, and that any contractor would have to be specified as part of the agreement that if the contamination still existed, they would have to go down deeper, essentially deep enough to remove all the contaminated soil.

Mr. MOLINARI. Doctor, you go on a little further and say that the amount of soil removed was about 15 percent of what previously the EPA had suggested was appropriate. So, your testimony indicates that at one point in time, EPA suggested that a certain quantity be removed in a Phase I settlement; and yet, in the cleanup, only 15 percent of that amount was, in fact, removed. What justification did you find for that lower figure?

Mr. HIRSCHHORN. We did not find any technical justification for the lower figure, as I've indicated. All I could infer, from what we have seen on the record, what's available, is that some other factor, presumably a financial economic consideration, drove that agree-

ment; but we do not see hard physical evidence for that limited amount of soil removal.

Mr. MOLINARI. OK. But now you draw some very serious conclusions as a result of this. On page 3, you go on to say, "the more contaminated soil that remains at Seymour, the more toxic chemicals will be dispersed and the more difficult and costlier it will be to clean up the site."

I get the clear impression from reading that, that it's your conclusion that even after the foot was removed, there was serious contamination remaining in the soil, and that contamination would continue to find its way down until it contaminates the ground water below.

Mr. HIRSCHHORN. Yes. It's just a matter of time. I mean, I think it makes common sense to people to realize that if you leave toxic chemicals in the soil, it's the same thing as what you had originally; it is just a matter of time until you have transport of those chemicals through the ground, and, if you leave enough time, eventually those chemicals can reach the ground water. I think a lot of people don't understand that with uncontrolled sites, you have a very complex process of what we would call movement or migration of toxic chemicals through the soil to the ground, and eventually perhaps into aquifers.

This is a relatively slow process in most cases. For example, I noted earlier that the amount of contamination found in the deep aquifer was originally less than in the shallow aquifer. Well, this makes perfect logical sense; it takes a longer period of time for the toxic chemicals to get into the lower aquifer. So, all I can say is that if you leave toxic chemicals in the land and water enters the site, you are likely to have, again, slowly, over time, more and more spreading out of the toxic contamination in the soil.

Mr. MOLINARI. I don't think there's anybody during the course of these proceedings and in other hearings that would disagree with that conclusion. The question I am asking is: What scientific evidence do you have or did you uncover suggesting that there still is a contamination problem after the 1 foot on top had been removed?

Mr. HIRSCHHORN. Well, I would say to you that the burden, really, should be on EPA and the people who are cleaning up and responsible for cleanup to insure that there is no contamination. That is a logical essential. Now, there is some superficial evidence; for example, we've had reports that the soil that existed on the surface after they removed the 1 foot, that it was obvious to observers—and there were observers onsite—that they could see, physically see, that the soil remaining was contaminated, that there was discoloration of the soil typical of what one knows to be contaminated "hot spots."

In fact, my understanding is that various State and EPA officials probably, at this point—I don't know what it would say on the record, but it is my understanding that there is a general acknowledgement that there still are "hot spots" of contamination in the soil, that this is not really being contested.

Mr. MOLINARI. Well, I get the impression that you are backing off on the statements that you have made. I go on to page 4, where you said:

It is doubtful that the now completed surface cleanup at Seymour has removed all the contaminated soil. To the contrary, it appears that significant amounts of contaminated soil remain.

Yet, when I questioned you about what scientific evidence, you're saying to me the burden of proof is on the other side.

How can you make such a statement without having anything to back it up? And that's the question I'm asking you now. I don't see any evidence, whatsoever, that you have any proof. But, in fact, what I originally heard is substantiated by your statement.

Mr. HIRSCHHORN. Well, I would say this. Certainly, since EPA didn't require the contractor or anyone else to take the physical measurements before they covered up, by the way, the exposed soil, those measurements were not done, in fact cannot be done, today, because after they've removed the soil, they've covered it all up, so that you have a physical problem of confirming that. All I can say is that we have used a train of logic which suggests that in the absence of them demonstrating that there is no contamination left after they took 1 foot away, that there seems to be a number of pieces of evidence to indicate that in all probability there remains contaminated soil there. And I would argue again that as part of a cleanup, one normally thinks of goals being established, standards being established, and the burden of proof be put on those who are responsible for the cleanup. They have not done that, nor is it physically possible to legally do that right now.

Mr. MOLINARI. I know that in my judgment, my own limited experience, it is not all that difficult to take some soil samplings and to determine what is there.

Mr. HIRSCHHORN. Well, you would have to do it again at a number of locations in the acreage. You'd have to do it at various depths. It certainly would cost a substantial sum of money. It's not a trivial sum of money to do that kind of work. The testing is straightforward, again, the laboratory testing, but——

Mr. MOLINARI. OK, let's take a sum, say $50,000. How much testing could you do for $50,000?

Mr. HIRSCHHORN. You could do probably enough samples to, again, not show with a lot of numbers the entire extent of contamination, but you probably could verify within a matter of a few weeks, whether or not there was remaining soil contamination.

Mr. MOLINARI. Well, in fairness to my colleagues, I think I'm going to stop at this point. But I would like to make the observation that as to the key issue of soil contamination, and removal of 1 foot of dirt, I'm far from satisfied that your statement is backed up by the information that you furnish in your testimony today.

Mr. LEVITAS. Dr. Rowland.

Mr. MOLINARI. Would you yield to the gentlewoman from Connecticut?

Mr. ROWLAND. Sure.

Mrs. JOHNSON. Thank you very much. I appreciate it.

One of the things that clearly drove EPA was their sense of limited resources. Have you done any cost estimates as to what would have been involved in a thorough analysis of the surface, subsurface, and air and what it would have cost to develop the kind of data plan that clearly you are advocating and that makes, certainly, logical sense to all of us?

Mr. HIRSCHHORN. It's fairly expensive to——

Mrs. JOHNSON. I don't want to know fairly expensive.

Mr. HIRSCHHORN. Well, it's hundreds of thousands of dollars.

Mrs. JOHNSON. I think your office ought to be able to come up, in the case of Seymour, with some estimate as to what we are talking about. Because, it is in the framework of that that we must decide whether we require a soil test—every 2 feet or every 3 feet; and do we require it over the whole acreage before we allow movement. As you say, testing could turn up no problem.

So those are the judgments that have to be made and I think, at least for me, that I would like to have your office get back to us with cost data I think it is important to know what we are talking about here.

Mr. LEVITAS. Dr. Rowland.

Mr. ROWLAND. Let's pursue that——

Mrs. JOHNSON. Thank you very much.

Mr. ROWLAND. Let's pursue that just a little bit further. You have a large site. And over this site there may be several hundreds of thousands of containers. There may be just a few of those containers that have rusted out and some of the chemicals are seeping out. Wouldn't it be difficult, unless you took multiple testings throughout that site, to determine whether or not it had adequately been cleaned up? Wouldn't you have to take almost an analysis of all of the soil on a foot by square foot basis in order to determine whether or not it had been adequately cleaned up?

Mr. HIRSCHHORN. You do require extensive sampling to prove that you've done the job completely. Which is why I would say that some contractors who deal with cleanup would argue that it pays, perhaps, to take out a lot of soil because you have a trade-off here—how much do you want to spend analytically to do the sampling versus just taking out a lot of soil—a more conservative, you might say, approach—to make sure you've removed all the contamination and then do a test on the level of soil that remains after you've done that removal.

There is, I think, a good case to be made for that strategy. For example, picking a number, maybe it's 5 feet or whatever, on the basis of some available information, but as I said earlier, then doing a test on the surface of soil that remains. So you're trading off some amount of sampling originally for perhaps just a greater amount of removal, but confirming what is left on the surface.

Mr. ROWLAND. Well, whose responsibility is it to determine whether or not the site has adequately been cleaned up? Is that responsibility determined by the amount of money that is expended on it; or is it determined by the person who has the cleanup contract as to whether or not they've done it adequately by showing that there is no contamination left in the various test areas? Or how does that work?

Mr. HIRSCHHORN. The chief responsibility is with EPA. I'm not faulting anything done by the contractors here. People did just what they were told to do; what they were paid to do. It is the responsibility, really, of EPA to establish the cleanup standards and goals for a site. And presumably, under the terms of the language in the statute, the primary consideration should be protection of health and environment.

The statute, again, by using the term "cost effectiveness," this has a definite meaning. It means that first you establish the cleanup goals to protect public health and environment and then you consider various alternatives which can satisfy and meet those goals; then you pick out the lowest cost alternative. That does not seem to be the logic and procedure that is used at Superfund sites.

Mr. ROWLAND. Then EPA has the responsibility to determine whether cleanup has been adequate and you have said that they did not fulfill that responsibility to the extent that they should.

Mr. HIRSCHHORN. Yes. Again to be clear, the adequacy can only be determined if, in fact, there have been some goals and standards established for the cleanup. Without those things being established, you don't know. You are left with this high degree of uncertainty as to whether the cleanup action that you paid for which took place, has in fact protected the public from toxic contamination. You don't know, because in this case, testing has not even been carried out to see whether it's safe.

Mr. ROWLAND. I want to, Mr. Chairman, pursue one other avenue just very briefly.

You say in your statement on page 6 that:

> There is, for example, no Federal requirement to fix a leak in a facility which is found to have contaminated a ground water supply; nor to have a leaking facility stop taking in toxic wastes; nor to have that facility provide assurance that it has the funds to fix the leak and clean up the pollution.

Aren't these types of concerns supposed to be addressed in the resource conservation and recovery statute? What is the problem, if this is still going on? Is it because the EPA's regulations are inadequate? Or just what's taking place?

Mr. HIRSCHHORN. Those three examples, in fact, apply directly to the subtitle C ground water protection standards for hazardous waste land disposal facilities, and we have, as part of our larger study, been pursuing an examination of the ground water protection standards. We are just completing that task of our study. It probably does surprise some people to find out that under the current ground water protection standards, in fact, there is no Federal regulatory requirement to fix a leak; even if you establish the evidence that the facility is contaminating ground water. It may surprise people, but that is the reality.

We have a pretty extensive study on this problem we hope to release soon. And I think it is very discouraging because, in fact, the ground water protection standards that are now in effect really do not seem to be very adequate.

Mr. ROWLAND. Even in spite of the fact that so much attention has been focused on the problems that we are having, there still continues to be no way to stop continued contamination, possibly, of our ground water.

Mr. HIRSCHHORN. I would say that as long as land disposal is the dominant method of managing hazardous waste, we have only one thing assured for the future. That is a continuous stream of uncontrolled sites that will require cleanup. Even if we stop land disposal today, however, I want to emphasize something. There are probably billions, billions of tons of toxic waste already in the ground. Since the end of World War II, this Nation has produced incredibly

large quantities of toxic waste. Most of those wastes have been put in the ground for a number of decades.

So that we have a problem with those existing hazardous waste facilities that, for many decades, have received all these toxic chemicals. And that is a major problem that has to be addressed by the ground water protection standards. Just dealing with what we will do with future, newly generated hazardous waste, certainly is important and we must do that, but we cannot neglect the fact that there is an awful lot in the ground already. And that's a major problem to contend with.

Mr. ROWLAND. One other point, then, this RCRA statute that has grandfathered in all of these disposal sites around the country, would you say that it is, that these are, right now not adequately administered in such a way that they are protecting our ground water supply now? Are they actually posing bad problems for us right now?

Mr. HIRSCHHORN. Absolutely. I would say that we have major problems with our ground water supplies in the United States. And the full extent of this problem is yet to be revealed.

Mr. ROWLAND. Thank you, Mr. Chairman.

Mr. LEVITAS. Thank you very much, Dr. Rowland.

Mr. Sundquist.

Mr. SUNDQUIST. Thank you, Mr. Chairman. I've been with Dr. Hirschhorn on several occasions, and I am very impressed with his knowledge in this area and his frankness.

I would like to observe, Dr. Hirschhorn, on page 2 that you seem to sum up what I would see as the problem of Superfund when you discuss no national cleanup goals or standards; implementation of the cost-effectiveness provision in the statute that leads to temporary rather than permanent solutions technologies; use of land disposal for wastes shifting from one site to another—in this case from Indiana to Alabama. And, in addition to those, the long-term problem that we've had with water.

I say that we ought to add one other to that list and that's the frustration of the private sector which tries to involve itself in the cleanup, pay their money for somebody to recycle and then find out that they are still liable. Then they pay some more to get it cleaned up and find out their problem still is not solved. It is just a question of frustration, I think, in part because we lack a policy set by this Congress. Would you comment on that?

Mr. HIRSCHHORN. Well, I would agree with what you just said. I think one thing that is very disturbing to many of us close to this area is that we would like to think that we would learn from the past. I mean, here we have inherited an incredible problem of uncontrolled sites, which, of course, motivated the Congress to pass the Superfund legislation. And yet, as a matter of policy, I would say more a problem with the executive branch, we do not have a clear policy saying:

> Listen, we have learned from the past. We have to move away as quickly as possible from land disposal, because as long as we depend on land disposal, we will have leaking land disposal sites, and we will just have to pay more and more millions of dollars to clean up those sites.

So I think the question is, really, can we learn, and learn quickly, from past experience.

Mr. SUNDQUIST. We don't seem to, do we?

Mr. HIRSCHHORN. I don't think so.

Mr. SUNDQUIST. In this instance at Seymour, it's your belief that EPA should monitor and check the ground water?

Mr. HIRSCHHORN. There is absolutely no doubt of that.

Mr. SUNDQUIST. They have not done that at Seymour. Is that correct?

Mr. HIRSCHHORN. There has not been enough. They have a study going on right now, as far as what is normally done at Superfund sites. Again, to more extensively and in a more detailed way deal with defining how much ground water contamination there is. My earlier comments concerning ground water protection—there is no doubt that we have official policy statements from EPA that say that everything that they do with regard to land disposal, ultimately rests on the ground water protection standards. That is, if those standards are judged inadequate, they may have some real problems with risk to public health and environment.

So protection of ground water is the most troublesome issue. Most of the major problems at Superfund sites, the most costly ones to deal with, are ground water contamination problems.

Mr. SUNDQUIST. Can we enact legislation to enforce it in some manner? Can we clean it up?

Mr. HIRSCHHORN. I am often asked this question. And I have to say in a very scientific, technical sense: "Yes. We know how to decontaminate contaminated water." Now, that's saying it in a very scientific, technical sense.

The problem is when we have real-world aquifers that are contaminated with toxic chemicals, although we may know the science and the technology of decontamination, the more practical engineering aspects of cleaning up an aquifer present incredible problems. If you attempt to do it, you have to recognize that it takes a great deal of money, and a great deal of time and you have to do an incredible amount of ground water testing while you're doing it to confirm the effectiveness of the approach. Which is why the figures to decontaminate an aquifer will usually be in the tens of millions of dollars, rather than a much smaller amount of money either to just contain the fluid in some way or to deal in surface cleanup.

There is no doubt that the Nation, and EPA really, has not fully addressed this problem of decontaminating aquifers. In fact, there is evidence now to indicate in the Superfund Program and as a matter of policy, there is a policy to abandon contaminated aquifers on the basis that it would cost less money to supply alternative drinking water supplies to citizens. I hear that all the time. That seems to make some sense to people.

My only point that I would make is that somewhere down the road, I would like to know where we are going to import all this clean drinking water for the United States from. I mean, that policy seems to make sense on a site by site, short-term basis, but we have a major problem in that if that contamination is widespread around the country, you can't walk away from aquifers. We have to really think very hard about cleaning up the water.

Mr. SUNDQUIST. When a dump site is in accordance with EPA specifications, how long is it before they require a measurement of water there at the site?

Mr. HIRSCHHORN. In an operating facility, the only—the timeframe in the regulations is about 30 years. And they may not even ask for that much measurement during the 30-year period.

Mr. SUNDQUIST. My recollection was less than 10.

Mr. HIRSCHHORN. Well, actually there is a 5-year period that is very critical. If they get by 5 years, you can get this shifting of responsibility to CERCLA. The way the situation is set up now, remembering that it takes a long time in most cases for the pollutants to move through the ground and through the aquifer is that the odds are that people who run facilities can escape their liability—their responsibility for cleanup will shift to the Superfund Program.

Mr. SUNDQUIST. Aren't we creating a bigger long-term problem, with our dumping?

Mr. HIRSCHHORN. Most of all the studies on ground water quality—in fact OTA has one in progress right now—will always cite hazardous waste as one of the chief sources of pollution of ground water. I haven't even begun to tell you other forms of hazardous waste problems that bear on the situation. As part of our ongoing study, for example, we're looking at sanitary municipal landfills which have legally received toxic waste over long periods of time as another example of a source of pollution for ground water.

Mr. SUNDQUIST. One last question. At Seymour, on a 1-to-10 basis with 10 being the most convincing argument that there is a problem still at Seymour to be solved, what would be your estimate on the chances that Seymour still has a problem? How convinced are you that Seymour has a problem?

Mr. HIRSCHHORN. Well, based on what I've seen, I would say it is almost certain that there is still a problem at Seymour. By the way, I would note that in the ranking system the fact that Seymour had some very, very—the highest ratings—in terms of the severity of the problem of an uncontrolled site. It was ranked as a very bad, uncontrolled site in the EPA system. And again, I think the evidence indicates to me today that we still have a problem at Seymour.

Mr. SUNDQUIST. Thank you.

Thank you, Mr. Chairman.

Mr. LEVITAS. Thank you.

Dr. Hirschhorn, let me deal with a couple of other points that we have not gone over. On page 5 of your testimony, you point out that the consultant study that was done for the 24 settling parties did not affirm ground water contamination, but it did contain a recommendation that an alternative water supply be used for nearby populations. What explanation do you have for why that would be done?

Mr. HIRSCHHORN. Well, again, I found it interesting too. It would imply to me that there is some recognition of a ground water problem even though you don't have a lot of data that would satisfy the parties involved as to the extent of that contamination. And I think that was, and continues to be sort of a sticking point here. That is, you have what I would consider to be a prima facie case

that there is ground water contamination. Yet you lack all the details of the extent of that contamination. But we think it is significant.

Mr. LEVITAS. The order, court order of February 27, 1984—that's about, just a little over 2 weeks ago—ordered the local water utility to extend the water line, even though water wells were not contaminated because the direction of the ground water flow was known and there was an iminent threat of danger to nearby residents. Now, who initiated the action that led to that order?

Mr. HIRSCHHORN. Actually I can't recall who initiated the action. And we are talking about a community with residential wells—not the municipal well system, but residential wells—and I actually can't recall who initiated that.

Mr. LEVITAS. I'm going to ask our staff to get a copy of court papers in that matter, because it would seem to me logical that in order for the court to have entered such an order, there must have been a showing of the plume movement that we are talking about with the contaminants that would present the so-called, imminent threat of danger to nearby residents. This would tend to confirm the conclusions you reached that there was contaminated soil still on the site.

Mr. HIRSCHHORN. Yes. As I said, there were contract studies done in the whole history of Seymour, and some of those studies really said exactly what the direction of the plume movement was. So I would guess that the court has looked at those records and used that evidence.

Mr. LEVITAS. Moving to the broader scope of your testimony for just a moment, there are two points that you make that I think ought to cause all of us some pause as we view this enormous problem. The first is that if EPA and the people EPA is dealing with either in litigation or in settlement, make solutions, reach solutions which simply postpone the problem to a later period of time—in other words, shifting the dirt around from one place to another—and providing alternative water supplies rather than cleaning up the contaminated aquifers, is it really a comment that we are not dealing with the cleanup, but we are simply—it is not a cleanup program, let me be specific, it is not a cleanup program—it is a shifting around of the dirt, and pumping in water from someplace else, as opposed to cleanup in either instance.

Mr. HIRSCHHORN. I often have a problem with the loss of semantic meaning anymore to the word cleanup. I don't think we are talking about cleanup very often. We are talking about taking some action, which in many cases makes a great deal of sense from an emergency action point of view, but I don't think we are addressing the full, permanent cleanup of these sites around the country.

Mr. LEVITAS. All right, now let's take the Seymour site for a moment. It is my understanding that, subject to EPA approval, the settling parties contracted with Chemical Waste Management, or one of its subsidiaries, to—quote, cleanup close quote—the site, which resulted in a transportation of whatever was being—quote, cleaned up close quote—to some other site. Is that your understanding of what occurred?

Mr. HIRSCHHORN. That's right. There were several land disposal facilities which were sanctioned for use in the settlement agreement. I think there were six.

Mr. LEVITAS. Did the—Let me put it this way. To your knowledge, did the settlement negotiations, or did EPA, ever consider or propose recycling or incineration as a method of cleanup of the soil and drums?

Mr. HIRSCHHORN. There was some incineration of some of the materials from the site. Clearly, as I've indicated earlier, the market prices today of doing incineration for waste and contaminated material are very clearly much greater than land disposal. So, if we just sort of look at the market price of land disposal versus its alternatives, land disposal will always come out cheaper.

But here the deception is—and I've raised this point often with EPA people—when they do the cost analysis, what they are not including for that land disposal option, is a virtual, you know, certainty—probably 100 percent probability—that somewhere down the road some corrective cleanup action will be required at that site where you are taking the waste to. If they factored in those potential cleanup costs, I think you would discover that the alternatives to land disposal were, in fact, cheaper, because for the alternatives, you wouldn't have to factor in those long-term costs.

And I just want to make the observation that cost of cleanup on a sort of per ton basis of waste in all the data that we've seen over the last several years, it costs generally about 10 to 100 times—sometimes up to a 1,000 times—more money to clean up an uncontrolled site than it would have cost originally to use something that appears more expensive such as incineration.

Cleanup is so much more expensive than destroying or detoxifying waste in the first place. And I would just argue that the way to look at the costs of the alternatives is that the system is sort of loaded and biased to pick what appears to be the lowest cost short-term option.

Mr. LEVITAS. It's one of those cases of pay me now or pay me later. And if you pay me later, it's going to cost you more money.

Mr. HIRSCHHORN. Absolutely. This is one of the best examples you could ever find of shifting some burden into the future—future generations—when you don't destroy or detoxify toxic waste.

Mr. LEVITAS. In your testimony, you point out that the decision that was made to reduce the amount of soil to be removed was an arbitrary decision in that there was no scientific basis that you have been able to discover for that. Is that a fair statement?

Mr. HIRSCHHORN. That's right.

Mr. LEVITAS. And that your conclusion—and if not your's, then I will say, my conclusion is that the basis for that was one of economics. That it reduced to the surface cleanup cost by approximately $4.4 million.

Mr. HIRSCHHORN. That's correct.

Mr. LEVITAS. OK. You then, in your statement, say a full and complete subsurface and ground water cleanup could cost from $20 to $40 million; or is that just the ground water part?

Mr. HIRSCHHORN. That's just dealing with the ground water. A study was done for CMA where they looked at various parameters of uncontrolled sites what waste was there and how much waste

and they tried to create a structure for estimating the cost of decontamination of ground water supplies. And it was very simple for us just to look at the data for Seymour and plug it into that system and that range is the estimate for the study done from CMA.

Mr. LEVITAS. OK.

Mr. HIRSCHHORN. I would say it is realistic from what we've seen from other estimates to decontaminate aquifers. It's well acknowledged by ground water experts around the country that you are talking about those kinds of figures to really permanently cleanup the contaminated aquifer.

Mr. LEVITAS. All right. Let me now pursue this a little bit to the next point. That the remaining surface cleanup costs, the ground water contamination monitoring and analysis costs, the costs of providing water lines to 100 nearby homes will, as I understand it, will almost exhaust the $5.4 million that has been made available from the pro rata settlers.

Mr. HIRSCHHORN. We don't know the full cost, for example, of providing the alternate water supply, but I would say, yes, I would expect a good fraction of that $5 million to be used up.

Mr. LEVITAS. So that will leave no funds, or few dollars, available from that source to address the ground water cleanup, if it is addressed at all?

Mr. HIRSCHHORN. That's correct.

Mr. LEVITAS. Now, if that is the case, who's going to pay for that ground water cleanup; assuming we clean it up?

Mr. HIRSCHHORN. I understand, of course, there are some generators and users of the facility that have not yet entered into any agreement—again, I'm not a lawyer—but I understand, of course, that all those parties that have signed off are, essentially, free of liability. So you are going to be faced with the situation if it has to be cleaned up, if it should be cleaned up, of the Superfund Trust Program, perhaps, bearing the cost. And the State, in this case the State doesn't seem too eager to enter into this process of cleanup. But it's going to come down to that choice. Either you clean it up and someone pays, or you abandon the site.

Mr. LEVITAS. Well there are some very interesting—you have disclaimed your legal credentials, so I'm not going to press you on it—but there are some very interesting legal questions that remain. One what we call in the law contribution, for example. Another one would be, some imaginative lawyer might figure out some way to set aside or reopen that court decree in the event that it was based on—well, at least some imaginative way to set aside that decree and get everybody back in the ball game.

What troubles me is, and at this I will pass back to Mr. Molinari, is that at our last hearing I asked a high EPA official, Mr. Lucero, knowing now what he knows about Seymour, would, I think I said, "Would you recommend that EPA should enter into the Seymour settlement again in light of what you know now?" And his answer was, after a rather significant pause which Mr. Molinari pointed out in the record was a very significant pause—he said, "Yes. I would."

Following that, I wrote a letter to Mr. Ruckelshaus in which I suggested that we haven't made much progress if that was the official position of EPA on the subject. And I wanted him to let me

know whether that was the official position—was that his position, or was that just Mr. Lucero's, who, understandably, was involved in that decision and there is a certain amount of, you know, not wanting to say, you shouldn't have done what you were involved in. And my response from Mr. Ruckelshaus was very cordial in which he advised me that he recused himself from the Seymour matter and therefore couldn't comment on it but that I would be hearing from Lee Thomas who would discuss the subject with me. I am, in fact, meeting with Mr. Thomas this afternoon to talk about some of these matters.

So, it troubles me to hear what you are saying. I will, without objection, make a copy of my letter and Mr. Ruckelshaus' response a part of the record so that members might have an opportunity to review it. What I am saying is that if Superfund is an important program, if they are really concerned about cleaning up these hazardous, and toxic waste sites, then I don't know whether we have moved 1 inch in that direction or whether we have been moving around in circles in light of what I am hearing today as compared to what I've heard in the last 2½ years.

[Information received from Mr. Ruckelshaus follows:]

COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,
HOUSE OF REPRESENTATIVES,
Washington, DC, January 31, 1984.

Hon. WILLIAM D. RUCKELSHAUS,
Administrator, U.S. Environmental Protection Agency,
Washington, DC.

DEAR MR. RUCKELSHAUS: For slightly more than two years now, the Subcommittee on Investigations and Oversight of the Committee on Public Works and Transportation has been examining the problem of the contamination of the Nation's water resources by improperly and/or legally disposed hazardous wastes. My reason for writing to you at this time is to express my deep concern about recent statements by an Environmental Protection Agency official concerning the Agency's toxic waste enforcement policies made to this subcommittee during an oversight hearing last month.

Since your return as EPA Administrator, steps have been taken in what appears to be a laudable effort to expedite the cleanup of abandoned waste sites, and to strengthen the EPA'a toxic waste cleanup enforcement policies. Recent testimony to this subcommittee suggests, however, that much of what is taking place may be only cosmetic, and that little has really changed.

Specifically, on December 20, 1983, the subcommittee heard testimony from EPA and U.S. Department of Justice officials concerning the government's handling of the Seymour Recycling Corporation Superfund case in Indiana. As you may recall, the federal lawsuit in this instance was filed in May 1980. After languishing for slightly more than two years, work on the case was suddenly speeded up in mid-1982. On October 26, 1982, one week before the national elections, EPA agreed to settle with 24 major corporations involved in that site for $7.7 million.

This initial settlement, which was to result in the cleanup of surface at the site, also permitted the 24 companies to shift any contingent liability for completing the surface cleanup to the cleanup contractor and the underwriters of a performance bond. Had they been held to the same terms for settlement as were subsequently offered to several hundred other companies that were involved, their share would have been $15 million.

EPA is now left with an additional $15 million in estimated, but as yet really unknown groundwater cleanup costs. However, only $5.4 million in additional settlement payments from other responsible parties who were required to pay their full "pro rata" share of the government's $20 million cleanup estimate are available for this purpose—or unwilling—to come up with its share of the cleanup costs, thereby prohibiting the use of the Trust Fund. A lawsuit against 50 of the remaining non-settling companies has also been filed by the Justice Department.

The companies that have already settled with the government in the Seymour case, under the terms of the various agreements, are free from any liability for any

of the additional costs needed to completely clean up the Seymour site. According to EPA documents and testimony by EPA officials, all agency staff ultimately approved of this approach. Consequently, either the "solution" for this site's groundwater problems is going to have to fit the dollars now available or a final complete cleanup will have to wait until enough money can be obtained sometime in the future.

In addition to the potential for delay in the completion of full cleanup of this site, I am also very disturbed about the signal this type of settlement sends to the business and industrial community: EPA drags its feet, is not tough, and posturing can get you out cheap and help you avoid full liability for cleaning up your hazardous waste probems.

During the December 20 hearing, I asked Mr. Gene Lucero, Director of the EPA Office of Waste Programs Enforcement, whether he would, at this time, make the same decision regarding the Seymour case, particularly in light of the new policies of the Agency. He responded that ". . . I would still make the same decision and recommend it to the final decision makers."

As I noted at the beginning of this letter, I am concerned that such a statement could be made in light of the continued stream of announcements about EPA policy changes that are supposedly taking place. This suggests to me that there really may be very little change taking place in the EPA's enforcement policies or attitude about protecting the environment and the public's health, a prospect I find most disturbing.

I would appreciate your taking a moment to review the December 20 colloquy between Mr. Lucero and myself, a copy of which is enclosed, and giving me your opinion on this serious matter. I look forward to hearing from you.

With best wishes, I am,

Very truly yours,

ELLIOTT H. LEVITAS, *Chairman.*

(Enclosure.)

Mr. LEVITAS. I think all of these questions got started when I asked you, based on hindsight and in light of the new EPA policy, would you make the Seymour-IBM settlement today?

Mr. LUCERO. Is that a question?

Mr. LEVITAS. Yes, sir.

Mr. LUCERO. Oh. It seems to me, given the factors that we looked at, if we had had our policy in place at the time, and I mean we would have to look at the 10 criteria that are there. There would be a written statement and a review of those. I am hesitant to say, because I am not exactly sure how we would assess it. My sense is——

Mr. LEVITAS. I am asking how you would. You know we are talking about something that I am somewhat familiar with, you and Mr. Ramsey, probably more than any other two people in the world, are intimately familiar with. You are familiar with everything that happened in the middle of July, on. You looked at this with a microscope. You were playing a major role in formulating the new EPA policy which you testified about previously before the subcommittee. And I suggest that you do have an opinion on that subject. I would just like to know what the opinion is, based on what you know today and in light of the new EPA policy, would you today make the Seymour settlement?

Mr. LUCERO. You will have to give me a minute.

Mr. LEVITAS. Surely.

[Pause.]

Mr. LUCERO. I would generally say that, considering the facts as I understood them at the time and as I understand them now, that I would still make the same decision and recommended it to the final decisionmakers.

Mr. LEVITAS. In light of the new EPA policy, we could have another Seymour settlement is what you are saying?

Mr. LUCERO. My sense is, and I was trying to run through the criteria that I can best remember, is that this one may fit that criteria, yes.

Mr. LEVITAS. Well, before I recognize Mr. Molinari, let me say simply this. That is your judgment and your opinion. You are a responsible official at EPA. And if it is your opinion that we could see another Seymour settlement, even in light of the new EPA policy, then I suggest, and again this is my opinion, that Mr. Ruckelshaus has not brought the Agency far enough along since he's come into that position, for reasons which have already come out, and those will come out during the remainder of the day.

ENVIRONMENTAL PROTECTION AGENCY,
Washington, DC, February 29, 1984.

Chairman ELLIOTT H. LEVITAS,
Subcommittee on Oversight and Investigations, Committee on Public Works and Transportation, House of Representatives, Washington, DC.

DEAR MR. CHAIRMAN: This is in response to your letter of January 31, 1984 expressing concern over the statements made by Mr. Gene A. Lucero, Director, Office of Waste Programs Enforcement (OWPE), on the application of the Agency's draft Settlement Policy to future settlement negotiations. In your letter you specifically referred to the Seymour settlement, entered into by the government and a portion of the responsible parties in the Fall of 1982.

Because I am personally recused from all participation in matters concerning the Seymour site, I will not respond to issues in your letter concerning that site.

Immediately prior to my return as Administrator, the Environmental Protection Agency had received considerable criticism focusing on the methods the Agency used to deal with potentially responsible parties (PRPs) at Superfund sites during settlement negotiations. At the time, the Agency had no written settlement policy that set forth for the Agency a comprehensive approach to settlements, the time limits under which the Agency would conduct negotiations, and the criteria that the Agency would use to evaluate a settlement offer.

Recognizing the need for such a policy, the Office of Solid Waste and Emergency Response (OSWER) and the Office of Enforcement and Compliance Monitoring (OECM) developed the Agency's Settlement Policy. A draft of the policy, which includes our policy on releases, was presented to your Subcommittee in a hearing on October 20, 1983, by Mr. Lucero and Mr. Richard Mays, Senior Enforcement Counsel, OECM. The Agency has incorporated into the policy many of the comments received during that hearing. This policy, although not final, is being followed throughout the Agency by attorneys currently involved in settlement negotiations. I am enclosing a copy of the most recent policy; you will be furnished the final statement once it has been signed.

Recent case experience has given us new insight into further refinements that need to be made to our release policy. A group comprised of representatives of EPA and the Department of Justice is currently working together to draft a more comprehensive guidance on negotiating releases. This guidance is not intended to provide a "cookbook" approach to negotiations. Rather, it will provide a strong and consistent approach to negotiating releases, yet one that is sufficiently flexible to afford government attorneys the tools necessary to deal effectively with the unique facts of each hazardous waste case.

I share your enthusiasm for a strong Superfund enforcement program, and have made the development of such a program a top priority during my tenure at the Agency. I would be happy to meet with you personally, should you desire to discuss the Settlement Policy or our other enforcement policies and guidance in greater detail. With respect to your continued interest in the Seymour site, Lee M. Thomas, Assistant Administrator for Solid Waste and Emergency Response will be pleased to meet with you to answer any questions remaining unresolved from the December 20, 1983 hearing.

Sincerely,

WILLIAM D. RUCKELSHAUS.

Enclosure.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OLEC
1983 DEC 12 PM 1:50

DRAFT

RECD MAR 1 1984
Subcommittee on Investigations and Oversight
Committee on Public Works and Transportation

MEMORANDUM

SUBJECT: Hazardous Waste Case Settlement Policy

FROM: Courtney M. Price
Assistant Administrator
Office of Enforcement and Compliance Monitoring

Lee A. Thomas
Assistant Administrator
Office of Solid Waste and Emergency Response

TO: Regional Administrators
Regional Counsels
Regional Waste Division Directors

The goal of EPA in settlement of hazardous waste cases has been and will continue to be to collect 100 per cent of the costs of cleanup at waste sites or to receive complete cleanup by the responsible parties. As a practical matter, however, settlement offers for less than 100 per cent of cleanup or the costs thereof will be proposed by the potentially responsible parties (PRPs). The purpose of this memorandum is to set forth criteria which should be used to evaluate such settlement offers.

In order to achieve cleanup at hazardous waste sites, the government will have to litigate or prepare to litigate the liability of PRPs at many of these sites. However, defendants will frequently express a desire to settle for reasons of their own, and given the normal delays and resource demands of litigation, and the public interest in achieving cleanup of these sites in the most expeditious fashion, it will be appropriate to consider settlement of the government's case at many of these sites. Some PRP settlement offers may extend only to part of the site or part of the total liability at a site. The following principles are intended to guide

the analysis of any settlement offer that does not address total cleanup of a site or 100 per cent of the costs of such cleanup *.

All proposed partial settlements in hazardous waste cases (i.e., settlements that provide for less than total cleanup of the site or 100 per cent of the costs of such cleanup) should be evaluated against the following settlement criteria. In the case of multiple party settlement offers, each PRP's status in relation to each of the following factors should be analyzed and then conclusions based on the individual analyses should be drawn concerning the group's offer. The framework for such an analysis should be a discussion of how each of the factors applies to the site in question.

Most of the criteria listed below are those which are used in evaluation of cases of all types, both in government and in the private sector, with some additions specifically applicable to hazardous waste cases. This memorandum also proposes a guideline for resource management in the form of a minimum figure below which negotiations should not be conducted and Agency resources expended, assuming EPA's case is considered by the Agency to be relatively sound by the application of the abovementioned criteria. These criteria should not be used to evaluate settlement of treble damage claims which the government may have against PRPs under Section 107 of CERCLA. A separate guidance will be issued on this point.

SETTLEMENT CRITERIA

1. Volume of wastes contributed to site by PRP -

Information concerning the volume of wastes contributed to the site by PRPs should be collected, if available, and evaluated in each case. The volume of wastes is not the only criterion to be considered, nor may it be the most important. A small quantity of waste may cost proportionately more to contain or remove than a larger quantity of a different

---

* The "costs of cleanup" as used herein mean the total actual costs as determined by cleanup financed by use of CERCLA funds, or, if the site has not been cleaned up, the estimated costs as determined by a Remedial Investigation/Feasibility Study (RI/FS) conducted in accordance with guidance issued by the Office of Waste Programs Enforcement.

waste. However, the volume of waste may contribute significantly and directly to the distribution of contamination on the surface and subsurface (including groundwater), and to the complexity of removal of the contamination. In addition, if the properties of all wastes at the site are relatively equal, the volume of wastes contributed by the PRPs provides a convenient, easily applied criteria for measuring whether a PRP's settlement offer may be reasonable.

This does not mean, however, that PRPs may be required to pay only their "fair share" based on volumetric contribution of wastes to the site. At many sites, there will be wastes for which PRPs cannot be identified, or, if identified, who are unable to provide funds for cleanup. Private party funding for cleanup of those wastes would, therefore, not be available were volumetric contribution the only criteria. Therefore, in order to achieve total cleanup at a site (or reimbursement of the cost of cleanup), it will be necessary in many cases to require a settlement contribution greater than the percentage of wastes contributed by each PRP to the site in order to achieve the Agency's goal of obtaining 100 percent of the cost of cleanup. This can be done through the application of the theory of joint and several liability where the harm is indivisible, and through application of these criteria in evaluating settlement proposals.

2. Nature of the wastes contributed

The human, animal and environmental toxicity, mobility, persistence and other properties of the wastes contributed by the PRPs proposing settlement are important factors to consider. As noted above, a small amount of wastes, or a highly mobile one, may cost more to clean up and dispose of or treat than less toxic or relatively immobile wastes. In addition, any disproportionate adverse effects on the environment by the presence of wastes contributed by those PRPs should be considered.

If a waste contributed by one or more of the parties offering a settlement disproportionately increases the costs of cleanup at the site, contribution of such waste would normally justify a larger percentage of cleanup being borne by those parties than would be the case by using solely a volumetric basis.

3. Strength of evidence tracing the wastes at the site to the settling parties

The quality and quantity of the government's evidence connecting the PRPs proposing settlement to the wastes at the site obviously affects the settlement value of the government's

case. The government must show, by a preponderence of the evidence, that the PRPs are connected with the wastes in one or more of the ways provided in Section 107 of CERCLA. Therefore, if the government's evidence against a particular PRP is weak, we should weigh that weakness in evaluating a settlement offer from that PRP.

On the other hand, under the theory of joint and several liability, the government is in a position to collect 100 percent of the cost of cleanup from all parties who have contributed to a site where indivisible harm is shown to exist. Therefore, where the quality and quantity of the government's evidence appears to be adequate to establish the PRP's liability, the government should rely on the strength of its evidence and increase the settlement value of its case. Discharging such PRPs from liability in a partial settlement without obtaining a substantial contribution may leave the government with non-settling parties whose involvement at the site may be more tenuous.

One of the considerations to be weighed in any analysis of a settlement offer is the amount of information exchange that has occurred before the settlement offer. The more the government knows about the evidence it has to connect that settling parties to the site, the better the analysis of this factor will be. The discovery provisions of RCRA and/or CERCLA should be used in development of that evidence and prior to preparation of the analysis.

4. Ability of the settling parties to pay

Although this is not a defense to an action by the government, the practical results of pursuing a party for more than the government can hope to actually recover because of the financial condition of that party should be discussed in any analysis of a settlement proposal.

This factor is usually most important when the government is seeking injunctive relief to force the cleanup or operation and maintenance of a site. However, in cost recovery actions it may be beneficial to obtain a judgment in excess of a party's current assets because any assets that are obtained in the future by such a party would be subject to that judgment unless the party is released under the bankruptcy laws.

Consideration should also be given to permitting the party to reimburse the Fund in reasonable installments over a reasonable period of time if the party is unable to pay in a lump sum and installment payments would result in benefit

to the government. See memorandum dated August 26, 1983, entitled "Cost Recovery Actions under Section 107 of CERCLA" for additional guidance on this subject.

5. Litigative risks in proceeding to trial

Litigative risks which might be encountered at trial and which should weigh in consideration of any settlement offer include such traditional factors as:

a. Admisfability of the government's evidence

If necessary government evidence is unlikely to be admitted in a trial because of procedural or substantive problems in the acquisition or creation of such evidence, this is an infirmity that should be considered as reducing the government's chance of success and, therefore, reducing the amount the government should expect to receive in a settlement.

b. Adequacy of the government's evidence

Certain aspects of this point have already been discussed above. However, it deserves mention again because of the dependence of the government's case on substantial quantities of sampling, analytical and other technical data and expert testimony. If the evidence in support of the government's case is incomplete or based upon controversial science, if the government's records are not complete or reliable, or the government's evidence is otherwise unlikely to withstand the scrutiny of a trial, such factors will lead to a reduction of the amount that the government might expect to receive in a settlement.

c. Availability of defenses

If one or more of the settling parties appears to have defenses to the government's action, such as those set forth in section 107(b) of CERCLA, this may lower the expectation as to what the government should expect to receive in a settlement from that PRP. Availability of one or more defenses to one PRP which are not common to all PRPs in the case should not, however, lower the expectation of what an entire offering group should pay.

6. Public interest considerations

The purpose of site cleanup is to protect public health and the environment. Therefore, in analyzing a settlement proposal the timing of the cleanup and the ability of the government to clean up the site are factors to be considered. For example, if the state involved cannot fund its portion of a Fund-financed cleanup, a proposal that provides the funds that will enable the government to clean up the site or a substantial portion thereof may be given more favorable consideration than one received in a case where the state can fund its portion of cleanup costs, if necessary.

Other public interest considerations include whether the federal government has the funds available for necessary cleanup and how quickly federally-financed activity can begin as opposed to privately financed action. There should be a need for speed to protect the public as opposed to a quick remedy that is not needed to protect the public.

7. Precedential Value

In some cases, in addition to obtaining the desired result in the particular case, the government may have in the case a factual situation that would be a precedent for future actions. In such situations, for example, strong case law can be developed in cases of first impression. Settlements in such cases tend to become precedents in themselves, and are examined extensively by PRPs in other cases. Settlement of such cases should always be on terms most favorable to the government. Where that is not possible, it may be to the overall interest of the government to try the case to the Court where the quality and quantity of the evidence is strong.

8. Nature of the case that remains after settlement

All settlement analyses should discuss and consider the nature of the case that remains if the settlement is accepted. For example, if there are no financially viable parties left to proceed against for the balance of the cleanup after the settlement, the settlement offer should constitute everything the government expects to obtain at that site. The rule of thumb to be applied is - What does the government gain by settling this portion of the case? Does the settlement or its terms harm the remaining portion of the case? Will the government have to expend the same amount of resources to try the remaining portion of the case? If so, why should the settlement offer be accepted?

9. Value of obtaining a present sum certain

If money can be obtained now and turned over to the Fund where it can earn interest until the time it is spent to cleanup a site, the net present value of obtaining the sum offered in settlement now can be computed against the possibility of obtaining a larger sum in the future. It may be that this calculation will show that the net present value of the sum offered in settlement is, in reality, higher than the amount the government can expect to obtain at trial. This may be the case where the government cannot immediately fund the cleanup and the trial of the case is based on a cost estimate from an RI/FS that grows more out of date with the passage of each day. EPA has developed an economic model to assess these and other related economic factors. More information on this model can be obtained from the Director, Office of Waste Programs Enforcement.

10. Inequities and aggravating factors

All analyses of settlement proposals should flag for the decision maker(s) any apparent inequities to the settling parties inherent in the government's case, any apparent inequities to others if the settlement proposal is accepted and any aggravating factors. However, it must be understood that the statute operates on the underlying principle of strict liability and equitable matters are not defenses.

RESOURCE MANAGEMENT GUIDELINE

If, by applying the above principles, the Agency's case appears to be one in which the government has a favorable advantage, then as a resource management tool, negotiations for a proposed consent decree, administrative order or other appropriate agreement with responsible parties should not be entered into by the Agency unless the responsible parties understand at the outset that such negotiations should begin no lower than 80 per cent of the cost of cleanup or performance of the cleanup. This figure was chosen in the belief that the use of limited EPA resources in extended discussions involving offers lower than 80 per cent would not be an effective use of those resources.

The use of 80 per cent of the costs of cleanup as a threshold figure for settlement negotiations does not mean that all proposals of between 80 per cent and 100 per cent will be accepted. There may be circumstances in which only 100 per cent of the costs or work will be appropriate.

Conversely, an analysis of the case using the above settlement criteria may indicate that to insist on a minimum of 80 per cent of the work or costs would be unrealistic and not likely to be achieved in an administrative or judicial proceeding.

In addition, pre-litigation negotiations between the government and the PRPs should normally not extend for more than 60 days. Exceptions can be considered in complex cases where there is no threat of seriously delaying cleanup action. Any extension of this time period must be predicated on having a good faith offer from the PRPs which, if successfully negotiated, will save the government substantial time and resources in obtaining the cleanup objectives. Various existing guidance documents, including the RI/FS guidance, the REAP guidance, and the Cost Recovery (CERCLA §107) guidance, discuss the policy regarding length of negotiations in more detail.

PARTIAL CLEANUP

There are occasions when PRPs may offer to perform or pay for one phase of a site cleanup (such as a surface removal action), but not commit to any other phase of the cleanup (such as groundwater treatment). As a general rule, it is highly preferable to not enter into "piecemeal" settlements, but to resolve all issues in one settlement. However, there are some cases in which it is necessary to conduct initial phases of site cleanup in order to gather sufficient data upon which to base an evaluation of the necessity for and type of work to be done on subsequent phases. In such cases and others which may justify an exception to the general rule, offers from PRPs to conduct or pay for less than all phases of site cleanup should be evaluated in the same manner and by the same criteria as set forth above.

RELEASES/COVENANTS NOT TO SUE

Potentially responsible parties who offer to wholly or partially clean up a site or pay the cost thereof normally wish to negotiate a release from liability or a covenant not to sue as a part of the consideration for that cleanup or payment. This is entirely appropriate, provided:

(1) the release or covenant does not affect any person other than the PRPs providing the consideration for the release;

(2) the release or covenant does not cover claims other than those involved in the case (e.g., claims under criminal or non-environmental statutes should not be released);

(3) the release or covenant does not cover any phase of the cleanup which the settling PRPs did not or will not perform or pay for, except in extraordinary circumstances in which the application of the above settlement criteria make it clearly in the public interest to agree to such a release. Concurrence of the Assistant Administrators for OSWER and OECM must be obtained before the government's negotiating team is authorized to negotiate regarding such a release or covenant.

(4) in cases where the cleanup is to be performed by the PRPs or their contractor, the release or covenant should normally become effective only upon the completion of the cleanup (or phase thereof) in a manner satisfactory to EPA. An exception to this may be where the PRPs hire a contractor to perform the cleanup, whose performance is secured by a satisfactory surety bond in an amount well in excess of the estimated cost of the work.

A release or covenant not to sue terminates or seriously impairs the government's rights of action against PRPs. Therefore, they should be carefully worded so that the intent of the parties and extent of the matters covered by the release or covenant are clearly stated. Any proposed settlement containing a release with any possible ambiguity will be disapproved and returned for further negotiation.

WRITTEN JUSTIFICATION FOR SETTLEMENTS

All settlement documents must be concurred in by OWPE and OECM-Waste, and approved by the Assistant Administrator for OECM in accordance with delegations. Agency practice has been to require a detailed justification of settlements at the time Headquarters approval of those settlements is requested by the Region. This will continue to be the practice. In any settlement, a written detailed justification should be submitted to OECM-Waste and OWPE by the lead Agency legal and technical personnel on the case. This will normally be the Regional attorney and technical representative.

The justification memorandum should include information on whether the settlement is for 100 per cent of the work to be performed at the site or the cost thereof, and if not, an evaluation of the percentage of work to be performed or cost paid; the advantages and disadvantages of the proposed settlement as measured by the criteria set forth above; and a recommendation of whether the settlement should be accepted or rejected.

Mr. HIRSCHHORN. In that regard, I just want to briefly mention that some of the points I have made are reinforced by the fact that right now EPA is attempting to reverse its policies. For example, they are doing a study which deals with the issue of cleanup goals and standards. I think there is a sort of passive admission that what they have been doing for some time does not work and they, I think, seem to be trying to find some way of dealing with the cleanup goal issue. They have not reached a decision yet, but I think that they have recognized that there is a severe problem.

Mr. LEVITAS. Well, that is an extremely important point because if this subcommittee's work over these last 2½ years means anything, I hope that it will mean that our efforts will get the Environmental Protection Agency, which is the agency of Government that has this responsibility on behalf of the American people, to put into its National Contingency Plan or someplace, clear-cut goals of what we are trying to achieve by the so-called cleanup of these hazardous waste sites and standards to measure whether we are achieving those goals or not.

And if we do nothing else but achieve that, then I think the work that this subcommittee has engaged in, which was initiated by Congressman Molinari's concern about what was happening in his own backyard in Staten Island, will have certainly been worthwhile to the American people.

Mr. Molinari.

Mr. MOLINARI. Thank you, Mr. Chairman.

I would like to clear up confusion that exists in my mind as to your prepared testimony and that which you spoke of before. We are looking at a number of sites throughout the country where EPA, and in some cases the Department of Defense, is undergoing what they characterize as a Phase I cleanup. The current policy is not to allow the settlors to buy their way out on a Phase I release such as they did here, but reach an agreement on Phase I cleanup costs reserving their right to sue for the subsurface cleanup.

Now, you have testified that 1 foot was inadequate and that perhaps they should have gone 5 feet. The question in my mind is maybe they should have gone to 6 feet or 7 feet.

How do we determine what is a reasonable measurement, and how do we reach that measurement in determining how much land farming should take place in Phase I?

In answer to Dr. Rowland, you had indicated that perhaps instead of spending money for testing, we might be better served by spending that money carting some more dirt around to another site. And yet in another breath you said that there should be more testing done to determine where there are hot spots or where there are other areas of contamination that should be removed.

Now, we are looking for some policy that we can adopt that makes some sense in tackling the cleanup problems that beset this Nation. I have to admit that I am confused by your answers, and I would ask you to try to clear up that confusion. What is that you are really saying is the way that problem should be approached in the future?

Mr. HIRSCHHORN. Well, as an example, I would say to you that it is very clear that if you are removing soil that is a matter of standard operating procedure with the EPA, there ought to be a require-

ment to perform chemical analysis on the soil that remains to see whether——

Mr. MOLINARI. How much analysis?

Mr. HIRSCHHORN. Well, they have to, as part of the original evaluation of the site, discover what chemicals, what toxic chemicals, are present, and there is an established procedure now to deal with that. They have set out a list of those most critical chemicals.

They know that. They have that information. It seems reasonable then to specify what are the acceptable levels of residual contamination for those toxic chemicals. That provides you then with sort of a closed loop: That you can establish the cleanup goals; you have to confirm that the cleanup has resulted in an action so that residual level poses acceptable risk—not zero risk, certainly, but acceptable risk.

That means doing a risk assessment. In other words, you must know how much chemical is left. You have to know the routes of exposure to populations. And that is part of normal risk assessment, which EPA certainly endorses.

I think that is an example. Another possibility, there are experimental techniques that are available that can also be used other than direct physical chemical sampling. There are some techniques which can be used to measure contamination in soil. In fact, one of our observations is that ORD, Office of Research and Development of EPA, has said that those technologies are available for detecting and monitoring contamination in soil.

The regulatory piece of EPA, Mr. Thomas' department, have not written into the regulations the use of some of these technologies which EPA's own ORD people say are readily available and can be used. I think one can use more technology in these situations.

Another example that may sound contradictory by me is that I have not been endorsing removal of toxic waste or contaminated soil and just putting that problem on another community. So when I said it might make sense to remove more soil, that might appear contradictory. Well, I am not in favor of shifting the burden obviously to another community. In that regard, I want to note that we have been having a dialog with EPA officials for many months now, mostly because of the Missouri situation, and we feel that there are technologies available and becoming more available to decontaminate soil, not merely to move it from one location to another, but to use chemical treatment or thermal treatment approaches to decontaminate the soil. I think this is a very important point. That will cost more money—again, what would appear to be more money in the short term—but there are companies right now who are developing those technologies who are eager to get into the cleanup market, which is obviously a multibillion-dollar market.

So I do not want to give the impression that I am endorsing just moving more soil from one location to another land disposal site. I think what we need from a Federal perspective is encouragement to use these high-tech solutions. The market right now for the high-tech solutions is just not there, because we have an endorsement again, a sanctioning of the use of land disposal, particularly for cleanup in the Superfund Program.

And again, the evidence, by the way, is clear. We could cite examples where cleanup wastes are going to sites that are themselves becoming leaking sites and will probably be Superfund sites.

Mr. MOLINARI. We have witnessed that already ourselves. It is a matter of deep concern to us.

Could you mention some of these high-tech proposals that you seem familiar with?

Mr. HIRSCHHORN. Well, one that we have documented in a previous report is a private company in Texas, for example, the Huber Corp., which has its own $10 million program, doesn't want any Government money, which is developing a new form of thermal destruction, which is called the fluid wall reactor, which is really a new form of incineration. And their one goal, their market that they are going for, is in fact soil, contaminated soil, which is a very good idea, I think. This is a major national problem. We have vast amounts of contaminated soil.

There is another company that we have cited in a previous report in New Jersey that has a chemical treatment approach for soil. That is promising also.

So we do see companies across the Nation. We get calls all the time, and we are getting literature in all the time, about high-tech solutions. And I think that we're on that track now.

Mr. MOLINARI. Are they solutions or proposals at this point?

Mr. HIRSCHHORN. Well, some are proposals. Some, I would say are solutions. You know, we do have around the country waste treatment detoxification facilities. They are being used. You can do this now, and they are being used to some extent.

I would argue that the extent of use is not enough, because most people are driven by economic considerations, which are sort of short-term in nature, and they are still, you know, picking the cheapest landfills or options right now. But again it is sort of a catch-22 situation; that is, until people perceive that there is a market for high-tech solutions, it is difficult to get these things fully developed and commercialized.

But I do want to point out—and I testified to this at another hearing earlier—we have had impediments imposed by EPA. I mean we had a company reveal to us they could not, for example, physically get a sample of contaminated soil in order to do their testing on. They didn't ask for money. They just said, "Give us a documented sample. We'll test it. We'll try and find out whether the technology works."

We have had those kinds of problems where Government is sort of standing in the way of private enterprise trying to prove that their technology works.

Mr. MOLINARI. Could you furnish to this subcommittee those instances that you know of where such examples existed? We would like to try to lend a hand, and I think we probably can if, in fact, we can document that they did occur.

Mr. HIRSCHHORN. Yes.

[Information received from Mr. Flax follows:]

TESTIMONY OF LOUIS FLAX, PRESIDENT, LOPAT ENTERPRISES, INC.

Mr. Chairman, we are a small business with an innovation for hazardous waste management. We have a probable affordable and safe technology for the treatment

and encapsulation of polychlorinated biphenyls, or PCB's, and possibly dioxin and other organic toxic chemicals. I would like to convey to this committee the multitude of problems and frustrations encountered by Lopat Enterprises in attempting to get meaningful response from the Environmental Protection Agency.

In January 1983, a formula developed by Lopat Enterprises Inc., known as K-20, was tested by the United States Testing Company of Hoboken, N.J. The test was conducted on various samples which had been contaminated by the laboratory with Arcolor 1242 (PCB). The results of this test, dated January 4, 1983, a copy of which this committee has, showed that K-20 had safely encapsulated a known amount of PCB. These samples were retained by the Laboratory for further testing in 30 days. We attempted to get in touch with EPA to advise them of what we were doing. Our initial contact was with Region 2 of EPA. After being switched from one extension to another, we were told that we were in the wrong office and told to call Atlanta, which we did. The result of the Atlanta call was the same. "You are in the wrong office. Why don't you call Miami?" So we did. Again the same result. "You are in the wrong office. Why don't you call Washington?" So we did. Washington told us that Texas was the place we should be talking to and gave us a number in Texas. Texas told us to call Region 9. When we asked where Region 9 was and was told San Francisco, we gave up and hung up.

We got the results from the laboratory on February 17, 1983, 36 days after the initial contamination of the samples, that showed K-20 was still holding the PCB. We contacted Rep. James Florio's office to try to get someone to listen to us. On April 15, 1983, we had a meeting with Mr. Chris Harris of Rep. Florio's office. Mr. Harris told us that he did not possess the expertise to assess the value of our test results and made an appointment the same day for us with Mr. Joel Hirschhorn, Project Director, Office of Technology Assessment for the Congress. He said it woud be up to Mr. Hirschhorn to make a decision on whether to carry these results any further.

Mr. Hirschhorn was impressed with the test data and made an appointment with EPA Superfund Office for April 20, 1983. Among the 10 or more persons representing EPA at this meeting was Mr. Conrad Kleveno and Dr. J. Paul des Rosiers. At that time we were told that before EPA would even consider our proposed technology, a disclosure of the formula would have to be made to someone in the agency to assure them that its contents could not create another problem as many of the past solutions to problems have done. This disclusure was made at a meeting a week later and their fears were put to rest. K-20 is a non-toxic, non-volatile, inorganic, colorless and odorless formulation.

In this second meeting it was decided that a protocol would be written for a series of four tests with K-20. When the first draft of the proposed testing was completed, it was forwarded to the Sample Management Office in Alexandria, Virginia, to be publicized and bids taken. However, the area in which it was sent was out of funds and so nothing was done. It is our understanding that Superfund dollars are not readily available for Research and Development. Since that time another protocol has been written by Dr. des Rosiers, which this committee also has in its possession, dated July 15, 1983, and marked DRAFT. This too has been laying in a dormant position for the lack of funds.

In the time that elapsed from the second meeting Lopat continued to have the contaminated samples tested at its own expense. Each subsequent test proved that K-20 contined to contain the PCB. On August 4, 1983, 203 days after the initial contamination, the tests proved successful. We ordered the laboratory to pulverize the cinder block sample and the cement sample to ascertain what was happening to the PCB. This test, which you also have the results of in your possession, showed that only 33% of the PCB was recovered from the cinder block and only a little over 40% from the cement block. K-20 could possibly be dechlorinating the PCB. Only further testing will give us this answer. But to our knowledge, no other sealant or epoxy has even been able to contain PCB for this length of time.

Armed with these test results we continued to make call after call to several areas of EPA to attempt to get soil tests run on PCB or dioxin contaminated soils to further prove or disprove the effectiveness of K-20. Efforts to get these tests run were to no avail. In April, 1983, Lopat was promised a sample of contaminated soil from Times Beach, Mo., by the Waste Management Program in Jefferson City, Mo. When it did not arrive as promised at our independent laboratory, we called to find out what happened. We were told "Nobody knows you. Just forget it." Yet we were told when the request was made for the samples that samples would be made available to anyone interested in developing a technology to work on soil. We asked for soil from other agencies to test at our own expense in a recognized laboratory but were refused because we didn't have a license. When we asked for the license we

were refused. We were also told that even if we did run the tests on our own that they would's be valid unless the government ran parallel tests with us and they didn't have funds for it.

The amount of money indicated on the protocol for the soil tests is approximately $4,000. We offered to borrow the money to pay for both sets of tests if only EPA would do it but they refused. We feel strongly that we may have the answer to containing or cleaning PCB and/or dioxin in soil and leaving it in place as opposed to the large sums of money needed to incinerate or remove soil to a dumping site. This is another plus that makes K-20 the possible affordable and safe technology that is so needed by our nation.

We continued to call members of the Congress with the hope that they would use their good offices to get these tests in the protocol run. Evidently someone in EPA took exception to this phone campaign, so in September I received a call from Region 2 of EPA. I was told: "Lou, I just received a call from headquarters about you. There isn't anyone you haven't called about your formula. So from now on, if it ain't in writing, it don't count." I told the party that I would continue to make phone calls to anyone and everyone I have spoken to up to this point and if I could find someone I hadn't spoken to who I thought could help, I would call them too. When I asked the EPA official what had to be in writing, he said an application for a license. I then called Washington and was told that they would send me the necessary guidelines to enable us to file requests for a license and a demonstration. EPA has always been aware of what our technology consists of but they sent me Guidelines for PCB Destruction Permit Applications and Demonstration Test Plans that governed incineration technology. Confused by this, I went to Washington and spoke with Mr. Hirschhorn who called the person responsible for sending the literature. He told Mr. Hirschhorn that he was at a loss as to what to do because there were no regulations governing our type of technology and to possibly consider writing our own protocol.

How many small companies have fallen by the wayside because of government agencies and regulations being completely inflexible to the needs of the inventor? How many inventions and technologies have gone to foreign governments because of their open-mindedness and willingness to help commercialize an idea?

Lopat has interest from Switzerland, England and Japan for this technology, K-20. We at Lopat refuse to let this idea die on the vine. This technology, should it prove out in testing, belongs in this country, not overseas. If it were perfected by foreigners it would force this country to buy it and increase an already staggering balance of payment deficit instead of lowering it by selling an innovation to them to solve their problems of toxic contamination.

I am often asked, "Why don't you sell out, if K-20 is so good, or get venture capital to develop K-20?" Mr. Chairman, eventually I may go public and get all the money I need, but now the problem is the government. I need EPA to verify that K-20 works for several toxic contamination and hazardous waste problems. I am not looking for government money. We have already invested much of our own money. What we need now is some immediate, relatively cheap lab work by EPA to assure industry and state governments that EPA finds K-20 effective. It hurts me to think that if Lopat was a big corporation, instead of just a small business, I wouldn't be in such a frustrating situation here today.

Thank you Mr. Chairman for the opportunity to tell my story.

Mr. MOLINARI. Let me shift for a moment to ground water contamination, if I may. At the Seymour site we have a problem where there is a plume of contamination. In your testimony you talk about the options of containment versus removal and destruction. What does it cost to contain a plume such as the one we are talking about here in Indiana?

Mr. HIRSCHHORN. Well, uncontrolled sites are, of course, very site-specific and the complexity of the problem. The average figure—and it's based on historical experience—is about $6 to $7 million for a containment approach to dealing with a plume of contamination. That is in the last year or so roughly what EPA is experiencing. There are a number of sites where they have built slurry walls and done counterpumping and various things like that to simply try to stabilize the situation. And that is the figure that they are using.

Mr. MOLINARI. Let me ask you this. In your judgment, does that containment theory work? Does it in fact contain?

Mr. HIRSCHHORN. Well, I don't think the evidence is in, again because we don't have the monitoring data over long periods of time, that base. We don't have that.

The problem is that is a kind of an approach that does take continuing operating and maintenance costs. Somebody has to bear that responsibility to ensure the operation of that kind of system. That is an issue which has come up repeatedly in the Superfund Program because this generally is shifted to the State.

Under the current rules of the game under Superfund, the States would take over operating and maintenance responsibilities. And I would say to you that many States in the country both in terms of technical personnel and financial resources are probably not able to take over that responsibility.

Mr. MOLINARI. Let me give you a concrete example. Recently, we received information about a site that we have been looking at where they had a so-called impermeable layer that wasn't so impermeable. We have been advised that, as you have indicated before, the ground water table moves very slowly and that it would probably be somewhere in the neighborhood of about 3 years before it would be drawn for drinking water supplies.

Now, we have got 3 years to deal with that problem. With your professional background, how would you suggest approaching it.

Mr. HIRSCHHORN. Well, the one thing that I concluded in looking at a number of these sites is that there really is great value to taking effective action early, that we see in a number of sites that over a period of a few years the situation gets so bad and so technically complex that you begin to see what I would phrase "prohibitive" cleanup costs; that is, so many tens of millions of dollars that there is a great reluctance to enter into that.

But what I want to emphasize is that if you act quickly in some of these situations, the costs for cleanup may be a tenth, a fraction of what they will be a few years down the road. That is just the nature of the situation. Again, water entering sites is a problem in a number of these cases, so that you actually sort of feed pollution over a period of time.

It pays to act early. You have to carry out these investigations as quickly as possible. Sometimes these studies, I am sure you are well aware, the studies themselves are going on for years at some of these sites. The resources are spread out a great deal in the Superfund Program, and I think that is one of the very difficult issues to deal with which we are looking at ourselves, is how do you decide where to put your resources, whether you can spread it out sort of in a superficial sense at a great number of sites or whether you should concentrate resources more at particular sites.

Mr. MOLINARI. But I am looking at it from more of a technical stand point. I don't think anybody is going to disagree that you need to move quickly. Obviously, nobody would argue with that.

We have now verified that there is a pollution problem that has spread through the ground water table. At this point in time it is not endangering anybody's health because it has not entered the area where it is being removed for drinking water. But it will be in

3 years. So that we have got 3 years within which to deal with the problem.

Now, from a technical standpoint, what kind of testing do you do? How do you sink your wells? What levels? What angles? I am trying to get some technical data on this.

Mr. HIRSCHHORN. Well, the first thing I would note is that attention should be paid to removing the source of the toxic chemicals. This is really interesting, that people do not think enough about this; that is, they are worrying about the monitoring and verifying where the plume is, at the same time the source of the toxic chemicals has not been changed. That is, the buried toxic wastes or contaminated soil is still there, the water is entering the site. So you have a driving force.

Mr. MOLINARI. I think that part of our problem is already taken care of.

Mr. HIRSCHHORN. OK.

Mr. MOLINARI. The soil is gone.

Mr. HIRSCHHORN. The problem of drilling wells is, although there is some science and technology involved, and we have looked at this quite extensively that it requires the greatest expertise.

We are the first ones to admit that the practice of dealing with the detection of ground water contamination and its cleanup, that practice is still in its early stages. It's very costly. In fact, what we see around the country, by the way, there appears to be a shortage of hydrogeological experts who know how to drill wells and how to conduct these tests.

We, in fact, as part of our larger study, have raised this issue: Does the Nation have sort of a bottleneck in the system because they do not have enough experts, perhaps, particularly in the ground water area? And I admit to you that it takes a lot of expertise and we see evidence of a lot of mistakes that have been made already on drilling of wells on sites.

Mr. MOLINARI. Have you had any experience with this kind of problem in relaying the base data to the National Enforcement Investigative Center and asking them to oversee the projected plan for dealing with the problem?

Mr. HIRSCHHORN. We have seen—and we have raised this in some reports that we have put out already—an absence of what you might call quality control procedures; that is, this oversight function that EPA is supposed to have with regard to cleanups. Are the cleanups being carried out effectively is really the issue here. And we do not see instituted yet a real institutional network or program to carry out that oversight function.

In fact, just the opposite; there seem to be numerous cases where things have gone wrong in cleanups and they have not been caught early enough to prevent very costly problems from developing.

I know of one situation where samples had just been lost at a very critical Superfund site. These are remarkable things that are occurring around the country. So I think that this is a major problem.

Mr. MOLINARI. I do not think you are answering my question, Doctor. I am asking about NEIC particularly and what your judgment of their expertise is in dealing with this issue.

Mr. HIRSCHHORN. Pardon?

Mr. MOLINARI. For example, I have submitted to NEIC at the request of the New York City, a cleanup plan they have worked out in great detail. They made an analysis, and they came back with a confidential report that, in fact, indeed, the city's plan was a good one for dealing with that particular problem.

My question to you is, do I accept them as a quality organization or is it your judgment that I should not accept their work?

Mr. HIRSCHHORN. We have had very limited interaction and exposure to that particular EPA group's work, quite frankly. In the one case that they have been involved in, I have not been impressed. But it is based on a very limited amount of information.

Most of the work, you know, that is being done in the Superfund Program are not enforcement actions, really; they are part of another piece of the Thomas' operation there. So we have had very limited exposure to that particular enforcement group.

Mr. MOLINARI. Thank you, Mr. Chairman. I have no further questions.

Mr. LEVITAS. Thank you, Mr. Molinari.

Mr. Rowland.

Mr. ROWLAND. Just a comment, Mr. Chairman.

It seems to me that what we have been doing is moving contaminated soil from one area and placing it in another area. And perhaps the only thing that has done is to dilute the contaminated soil with some that is not contaminated.

It seems to me that in the long run what we are going to have to do is to develop some methods to neutralize the discharge at the time it takes place because, based on what I heard you say, that land disposal is certainly not the way that we need to go.

In fact, my questioning earlier indicated what you had said also, that there continues to be toxic waste to come into these dumps and it continues to contaminate our land area and consequently our ground water.

So am I correct in saying that if we are going to really address this problem, we are going to have to do something to neutralize this waste at the time it is discharged by chemical means or incineration or whatever?

Mr. HIRSCHHORN. Absolutely. We used the term "waste treatment" in some sense. By "treatment," we mean destruction of whatever is toxic, or detoxification, rendering the material inert and harmless. And there are, you know, numerous technologies that have been used over a period of time to do this.

I would say that both the National Academy of Sciences as well as the Office of Technology Assessment released reports just about 1 year ago, and both groups came to the same conclusion: that there were technological alternatives to land disposal available. It wasn't so much a question of science and technology; it was really a question of economics why these weren't being used.

And I would say that situation really hasn't changed that much. In fact, we have more development of alternatives to land disposal, but the problem remains one of economics.

And again I think the situation varies a lot within industries. There are some companies that are more progressive, that see their long-term liabilities in a realistic way and are attempting to use

more waste treatment alternatives to landfill. So that is very definitely the case.

But nationwide, most hazardous wastes are still being put into the land in one form or another.

Mr. ROWLAND. Did I understand you to say that EPA had been interfering with some companies that have made some proposals to deal with just that situation?

Mr. HIRSCHHORN. I would say EPA as a regulatory agency, narrowly, has not put a lot of emphasis on providing assistance and incentives for the development of technology. And whatever they have done in the hazardous waste area, most of their resources actually are put in on regulating land disposals rather than putting their resources in on the alternatives to land disposal.

So there is a sanctioning of the use of land disposal by EPA. For example, there are no regulations established for some of the alternatives to land disposal, which makes it very difficult for people to use the alternatives because there are no regulations. And again, the classic "Catch-22," EPA says, "Well, we can't regulate it because they're not being used. People in industry can't use it because they're not being regulated."

Somebody has to break that logjam.

Mr. ROWLAND. Thank you.

Thank you, Mr. Chairman.

Mr. LEVITAS. Thank you very much, Dr. Rowland.

And Dr. Hirschhorn, I want to thank you for your testimony today. I am going to keep the record open for an additional 2 weeks in order to receive the other materials that were requested and any other matters that might be offered by way of supplement to your testimony today.

Before I close the hearing, let me make this announcement that tomorrow the subcommittee will meet at 9:30 a.m. in room 2237 of the Rayburn House Office Building. At that time we will receive testimony from some of the companies who were involved in the surface cleanup settlement; specifically, IBM, DuPont, and General Motors.

Following that we will hear from some companies who were pro rata settlers, those who contributed a pro rata amount, as I indicated earlier. And then also from defendants in the pending litigation. Specifically, we will be hearing from Alcoa, Stewart-Warner, and from the Monsanto Corp.

On Thursday, completing those 3 days of this portion of these series of hearings, we will be hearing from and receiving testimony from Chemical Waste Management, a company that was engaged by the settling parties to perform the cleanup at the Seymour site.

I expect that during tomorrow's hearings and those on Thursday we will be seeking answers to a number of questions including specific responses to matters covered by Dr. Hirschhorn's testimony today.

One thing I think was quite apparent, that Dr. Hirschhorn comes to some dramatically different conclusions from those that have been previously been testified to by administration witnesses and statements which have been made by some of the people whom we will be hearing from tomorrow. And it is the purpose of hearings to

hear both sides of a particular issue so we can come to our own conclusions.

But I think that, Dr. Hirschhorn, your testimony today clearly sets the stage for a difference, a dramatic difference, in assessment of whether or not we really do have a cleanup program at all under the Superfund and related statutes. And I want to thank you for your very provocative testimony today, and we look forward to continuing to work with you and the Office of Technology Assessment.

There being no further business before the committee today, the subcommittee stands in recess, subject to the call of the Chair.

[Whereupon, at 12:12 p.m., the subcommittee was adjourned, to reconvene at 9:30 a.m., Wednesday, March 14, 1984.]

[Information received from ERM-Midwest, Inc. follows:]

CASE STUDY

SEYMOUR RECYCLING CORPORATION
SEYMOUR, INDIANA

by

ERM - Midwest, Inc.
Columbus, Ohio

Submitted to

Office of Technology
United States Congress
Washington, D. C. 20510

March 5, 1984

This contractor report was prepared as background information for OTA's ongoing assessment: Cleanup of Uncontrolled Hazardous Waste Sites Under Superfund. It is being made available solely for review purposes, and should not be quoted, circulated, reproduced, or represented as an official OTA document. As a contractor's report to OTA, this report has not been reviewed or approved by the Technology Assessment Board. The findings and conclusions are those of the authors and do not necessarily reflect the views of OTA, the Superfund Advisory Panel, or the Technology Assessment Board. The OTA assessment is still in preparation and may arrive at somewhat different conclusions because of additional information received after the completion of this document.

EXECUTIVE SUMMARY

This report is a case study of events and occurrences which led to the surface cleanup of the Seymour, Indiana, hazardous waste site. The purpose of the report is to analyze this generator-funded cleanup in terms of the technical information and decisions made to determine what actions could possibly be modified to effect more cost-effective and readily implementable cleanup measures at other facilities.

As of January 1984, the surface cleanup of the site has been completed. Subsurface investigations have begun and remedial subsurface measures will take place upon their completion. The subsurface cleanup will be paid for by another group of generators.

The U.S. District also ruled in late February, 1984, that a water line should be extended to approximately 101 residences located northwest of SRC. The ruling, a result of a petition filed by the Seymour Chamber of Commerce on behalf of the residents, stated the groundwater posed an imminent danger to the residents and a line should be extended by Seymour Utilities and paid for by the $5MM in funds contributed by the second group of generators.

Background

The Seymour Manufacturing Company began operations in Seymour in 1872 as a producer of farm hand tools and fireplace accessories. In 1968, they established a chemical division for recycling chemicals and, in 1969, leased 13 acres of land in the industrial park near the Seymour municipal airport. After acquiring two incinerators, waste processing began at the site in 1970, reaching peak volume in 1974. The firm was incorporated as a separate company known as Seymour Recycling Corporation (SRC) in 1976 and was sold to Environmental Processing Corporation in 1978. Operations ceased at the site in early-1980, after the owners declared bankruptcy.

The State of Indiana began receiving nuisance complaints about SRC in 1972 and eventually filed a lawsuit to cleanup the site in 1978. The owners at the time signed the consent decree to clean up the site but this ceased when they declared bankruptcy. USEPA then began emergency actions in early 1980, including restaging drums, installing monitoring wells, and constructing a wastewater pretreatment system. Two companies also moved their wastes off-site. Various additional emergency actions and investigations took place during 1980-1982. A group of 24 generators finally negotiated a settlement agreement for a surface cleanup in exchange for full release from all liability in October, 1982. The surface cleanup began in December, 1982,

and has essentially been completed as of mid-January, 1984. Also, as of mid-February, 1984, approximately $5MM has been collected from a second group of more than 100 generators to fund the subsurface cleanup of the site.

National Priority List

Seymour Recycling was the highest ranking Indiana hazardous waste site. The site was originally scored using the Mitre model for its inclusion on the Interim Priority List. Later, after an audit by the USEPA Field Investigation Team recommended rescoring the highest rated 175 sites nationwide, the Hazard Ranking System was used to rank the site on the National Priority List.

Although air pollution problems were the original causes of complaints to the State of Indiana, neither ranking acknowledged the air pollution problem because there was no sampling done of the air that actually documented the problem. By the time the USEPA Remedial Enforcement team was on the scene, the incinerators had been closed down and no documented air pollution could be made.

Alternative Cleanup Approaches

Various cleanup alternatives were evaluated by a USEPA contractor before the final surface cleanup was agreed to, including incineration in nearby cement kilns, on-site incineration and on-site neutralization, as well as off-site removal and disposal of drums and contaminated soil. The eventual surface cleanup alternative estimate included removal and disposal off-site of all drums, bulk tanks and debris, plus the excavation, removal, disposal and replacement of five feet of contaminated soil from the entire site. The surface cost estimate for a "worst case" cleanup was $15.5MM. Another USEPA contractor evaluated various subsurface alternatives, including impervious caps, slurry trench walls and alternative water supplies to serve nearby residences. However, a detailed cost estimate was never prepared which itemized the subsurface cost and the $15.5MM which was publicized was never entirely substantiated.

These alternatives were developed by contractors to USEPA with very little input from State of Indiana people. In fact, the surface cleanup agreement was negotiated almost entirely by USEPA with only limited input from the State. It appears, however, that the State of Indiana chose a relatively passive role in this regard.

Emergency measures employed by the Environmental Response Team (through its subcontractors) such as restacking the drums and fencing the site, did not appear to fully resolve any problems,

except for generator-initiated actions which resulted in the physical removal of drums from the site.

A major point of concern for the cleanup was the determination of a cutoff point between the surface and subsurface portion of the project. The original alternative evaluation specified the removal and replacement of five feet of contaminated soil, while the final negotiated consent decree specified one foot from places where drums were stored (approximately 58 percent of the site). Neither in the alternative evaluation nor in the consent decree was a specified degree of residual contamination (i.e., a practical termination point) defined. The one-foot cutoff limit appears to have been a negotiated point.

Evaluation of Chosen Cleanup Technology

The surface cleanup began in December, 1982, and included the removal and disposal off-site of all drums, wastes and miscellaneous items, as well as one foot of soil from 58 percent of the site. The negotiated cleanup cost was $7.7 million, significantly less than the $15.5 million originally estimated in 1980. This estimate was based on off-site disposal of 60,000 drums and 105,000 cubic yards of contaminated soil. However, only 48,700 drums and 14,300 cubic yards of soil were removed from the site. Sampling requirements were also reduced from that originally estimated and all the wastes were disposed of in permitted, specified hazardous waste landfills.

By adjusting the original E and E estimate for the actual quantities disposed, the adjusted cost estimate for the surface cleanup is $6.9 million. Allowing for disposal in permitted hazardous waste sites (which the original estimate did not), it appears that the $7.7 million cost to the group of 24 generators is reasonable.

Cleanup goals specified in the consent decree included sealing on-site wells, off-site disposal of all stored waste and debris, removal of one foot of soil and replacement, and removal of structures and miscellaneous material. These goals were followed by the cleanup contractor with minor variation. A major oversight of the cleanup, however, was the lack of provisions to deal with the long-term economics of the system related to the wastewater collection and treatment system and groundwater monitoring (although both of these items could be included as part of any future subsurface settlement agreement).

A major shortcoming of the cleanup was the limited interaction between the government and the local residents. Only one poorly-attended public meeting was held at the beginning of the cleanup, at which time the residents were told just what was to be done. A local Chamber of Commerce task force did meet

regularly with the USEPA On-Scene Coordinator, but these meetings were closed to the public. The mayor of Seymour felt the lack of information added to the local people's fear of the unknown and felt that a weekly summary of activities published in the local newspaper would have been beneficial.

Had NCP procedures been enacted prior to the surface cleanup agreement, a different scenario may have evolved. Because of the requirement for state matching money, the required amount to meet 50 percent of the cleanup estimate ($30 million) could not be generated, even though the State of Indiana established a fund in 1981 specifically for abandoned sites.

FINDINGS AND CONCLUSIONS

Major findings and conclusions of the case study of the SRC are listed below:

1. Documented evidence (laboratory data) was needed to receive points for air pollution on the HRS scoring. Even though numerous written complaints were received from individuals and State reports detailed the problem, no air samples that documented pollution were taken off-site.

2. The surface cleanup estimate of $15.5M, prepared in early-1980, was never adjusted to reflect the costs incurred for emergency and remedial actions, or the removal of hazardous material by two generators.

3. A detailed subsurface cost estimate report could not be found. It appears the estimated $15 million cost for a subsurface cleanup was pieced together from other reports. Preparing this estimate was hampered because soil borings and monitoring wells could not be installed on-site because of the number of tanks, buildings and debris.

4. The negotiated surface cleanup plan included the removal and replacement of one foot of contaminated soil (about 14,300 cubic yards) versus five feet of soil (105,000 cubic yards), which was the assumption used for the $15.5MM estimate. This resulted in a substantial cost savings compared to the early estimate.

5. Adjusting the 1980 surface cleanup cost estimate ($15.5MM) using the actual quantities of materials removed and disposed by the cleanup contractor gives a total of $6.9MM. This amount is close to the cleanup contractor's estimate of $7.7MM, since the $15.5MM was not based on disposing of all wastes in approved hazardous waste sites.

6. Emergency and remedial actions prior to the actual cleanup were relatively ineffective and may have hindered the cleanup, since the structural integrity of the drums was reduced. The impact of these actions on the cost of the cleanup was slight.

7. No provisions were included for long-term operation and monitoring of the surface wastewater treatment system. The integrity of the sewer leading from the site was also never checked and was felt to be a possible "seep" for groundwater from the site.

8. Cleanup activities functioned smoothly after the cleanup contractor devoted adequate managerial and administrative

personnel to the site. Prior to this there were several safety and administrative procedures that caused problems.

9. No documentation could be found for setting a one-foot-deep soil cutoff level for the surface cleanup. This apparently was a negotiated limit. No limit on the degree of residual contamination of the remaining material was specified.

10. Interactions between the government and the public were limited, due mainly to the lack of an organized group to represent the citizens.

11. The State of Indiana took a fairly passive role during negotiations and the cleanup, citing a lack of resources and personnel as the reasons.

INTRODUCTION

The City of Seymour, Indiana, is located approximately 65 miles south of Indianapolis, along Interstate 65 in the White River drainage basin. Seymour was the site of a U.S. Army cadet training center during World War II and the land and airfield built by the U.S. Government were turned over to the City at the end of the war. The City turned the site into a municipal airport and an industrial park, which eventually attracted the establishment of the Seymour Recycling Corporation. Over the course of approximately ten years, the Company accumulated thousands of drums and tanks of paint sludges, acids, solvents, and other hazardous wastes, until abandoning the site in early-1980.

The resultant abandoned hazardous waste site then became the problem of USEPA and a cleanup agreement was eventually reached with a group of generators for a surface cleanup.

This report is a case study of the Seymour Recycling Corporation cleanup. It presents the chronology of events leading up to the cleanup, assesses the scoring system used by the State and USEPA to rank the site on the National Priority list, discusses the various cleanup alternatives considered for the site and the technical decisions made, and assesses the actual cleanup work in terms of protection of the public health and environment.

The National Contingency Plan (NCP) was not fully implemented at the time of this cleanup and, as a result, falls short of the comprehensive cleanup requirement specified by the Act. Correspondence and technical reports were reviewed to get a clear understanding of the steps taken to complete the cleanup task. Telephone contacts and interviews were also made with responsible parties of the generator group, cleanup contractor, USEPA, Indiana State Board of Health and local Seymour residents.

42-590 O—85——5

1.0 CHRONOLOGY OF EVENTS

The chronology of events beginning with the establishment of the Seymour Manufacturing Company in 1872 and continuing through the completion of the surface cleanup is given in Table 1-1. This chronology highlights the major events leading up to closure of the site in early-1980 and lists individually the emergency remedial actions and investigations which took place thereafter.

A summary of actions contracted by USEPA for various emergency cleanup activities and investigations is given in Table 1-2. These actions and investigations are further discussed in Chapters 3 and 4.

A list of interested and knowledgeable individuals, many of whom were contacted for this study, is included in Appendix 1. These parties are grouped according to the following categories:

1. Public Officials
    2. Federal
    3. State
    4. County
    5. Local
6. Private Citizens
7. News Media
8. Public Interest Groups
9. Business Groups
10. Generators and Generator Representatives
11. Contractors and Consultants
12. Other

Table 1-1

CHRONOLOGY OF EVENTS

Seymour Recycling Corporation
Seymour, Indiana

Date	Event
1872	Seymour Manufacturing Company initiates operations in Seymour, IN; continuous operations have been maintained; major products are farm hand tools and fireplace accessories; 1981 gross sales about $8 million dollars; is a Delaware corporation owned by members of two families descended from Company's founders.
World War II	U.S. government used site and other adjoining land for a cadet training center designated as Freeman Army Airfield.
End of World War II	Freeman Army Airfield turned over to the City of Seymour for use as an industrial park and municipal airport.
1955-1966	Portion of industrial park used by Amoco to test rocket fuel under government contract; Amoco facility had certain bunkers and buildings which subsequently proved attractive to Seymour Recycling Corporation as outlined below.
1968-	Seymour Manufacturing Company established a Chemical Division for recycling chemicals; initial operations involved a still for recycling freon at its main plant; need for a separate facility soon became apparent.
Aug. 27, 1969	SMC leased 13 acres of land and facilities formerly utilized by Amoco at Freeman Field industrial park to establish operations of the Chemical Division; more still purchased; additional kinds of industrial waste accepted; eventually two incinerators were purchased to handle disposal of accumulating still bottoms.

1970	Chemical Division initiates operations at new site.
1971-1974	Waste processing reaches peak volume in 1974.
1972-1973	State of Indiana begins to get nuisance and air pollution complaints regarding operations of the SMC Chemical Division.
July 6, 1976	SMC Chemical Division was incorporated as a separate corporation, SPC, with identical ownership by two families -- the Burgesses and the Hobsons.
1978	State of Indiana files a lawsuit to clean-up the site which had become a nuisance. By one estimate, there were 40,000 drums in various states of decay and disarray. Owners sign consent decree to clean-up site. Burgesses and Hobsons sell SPC to Environmental Processing Corporation, one of several companies including ChemDyne, owned by Bruce Whitten and William Kovacs. Hobsons sold their interest in SPC for $1.00 and Burgesses for an unknown amount which included a $100,000 loan to Kovacs to clean-up the site under consent decree.
Jan-Feb 1980	Kovacs ran out of money; operations ceased at the site.
March 1980	EPA engages in a containment action under Section 311 of Clean Water Act; new berms constructed - drums restaged; monitoring wells & carbon treatment system installed; work done by O.H. Materials and others and paid for by Coast Guard - $560,000. EPA wanted to proceed with entire site clean-up using Coast Guard 311 money, but cost would have exceeded Coast Guard's entire 311 budget; Coast Guard argued that navigable waters were not in jeopardy, therefore, 311 money not an appropriate source of money. Total clean-up cost was estimated by USEPA at $25 million.

April-May 1980	IBM, which had many drums at SRC and which had been concerned with site conditions since 1978 (when they stopped using the site) contracted with OH Materials for $1.2 million to remove IBM drums and to dispose of them at Chemical Waste Management's facility at Calumet City.
April 1980	EPA files suit against SRC, SMC, the Board, the City of Seymour, and individual defendants.
July 1980	O.H. Materials cleaned-up acid spill resulting from tank failure.
Oct-Nov 1980	EPA hired KV Associates to do a groundwater study which established definite groundwater contamination and a definite threat to navigable waters. Coast Guard then agreed to the use of 311 money for a degree of site clean-up involving bulk tank removal -- 36,000 gallons of liquid waste sent to Cincinnati MSD for incineration, plus 150,000 gallons of sludges also sent to MSD. Work was done by Petrochem at a cost of $700-800K.
Early 1981	Petrochem completes limited clean-up by January; a limited amount of pesticide not incinerated (at MSD) until Spring 1981 due to necessity for a special permit.
Spring 1981	Groundwater study conducted by ES&E and soils study conducted under F.I.T. contractor. U.S. EPA policy was not to use Superfund money for site cleanups that didn't present real emergencies, which Seymour did not. Therefore, only source of clean-up money would be the generators under their CERCLA and RCRA (7001) liabilities.

	Region V EPA also determined that State match to use Superfund money would have to be 50% not 10% since the site was City-owned; Indiana did not have such resources.
	Region V EPA met with a group of generators that had the largest amount of waste at the site; first thought was to ask the top 100+ that had more than 0.1% of the total of waste at the site to contribute on a pro rata basis; generator with largest quantity was IBM (approximately 10%). Even though IBM and Cummins had removed their drums, they were still considered liable at this point in time.
Fall 1981	A group of large contributors/generators retained Birch Bayh's lawfirm to help. Region V EPA was approached to consider going after pro rata payments contributions from all (approx. 350) contributors not just those who each had contributed more than 0.1% of the waste. Collectively, the additional 250+ generators accounted for 10-15% of the waste.
May 14, 1982	U.S. EPA/Dept. of Justice ultimately sent letters to 360 generators advising each generator of their responsibilities and EPA's plans to undertake a series of studies and to bill the costs of the studies and the ensuing cleanup to the generators.
Subsequent to May 14, 1982	"Bayh group" proposed that they pay one-third (approx. $4.5 million) of an estimated $10-14 million to effect a surface clean-up and that the remainder be paid by SRC and the State of Indiana. EPA rejected the offer.
Summer 1982	Things at a standstill. EPA realized "Bayh group" would not come up with an acceptable offer. It became apparent that more studies were needed to assess degree of subsurface contamination, and that drums had to be removed before such studies could be done. But, no source of

	funds existed to proceed with either -- though the potential to collect downstream based on May 14, 1982 letter did exist.
September 9-10 1982	U.S. Government (EPA & Justice) and State of Indiana met with all contributors to offer pro rata agreement in return for covenant not to sue. Total estimated cost set at $30MM -- $15MM for surface clean-up and $15MM for subsurface.
Post September 9-10 1982	IBM and several other generators propose to pay for total surface clean-up in return for full release from all liability. EPA received offer favorably as long as the group collectively did not represent contributors of over 50% of the waste.
Sept-Oct 1982	Above agreement negotiated with IBM and 23 other generators - Oct. 26 — Settlement document lodged/filed - Nov. 7 — Public meeting at Seymour - Nov. 10 & 30 — Hearings - Dec. 8 — Approved - Dec. 10 — Opinion - Early December — Chemical Waste Management initiated work on surface clean-up
Oct. 28, 1982	Pro rata offer described in Sept. 9-10 meetings and submitted by letter to all contributors (except IBM and the other 23 generators). To date, 195 additional companies have voluntarily contributed approximately $5MM under the proposed offer/agreement. This money goes toward the subsurface cleanup.

Oct. 1983	Chemical Waste Management has almost completed its surface clean-up. EPA/Justice is preparing to prosecute the remaining 100-120 non-settlers; 60-80% will probably settle willingly.
Jan. 1984	Additional groundwater and soil sub-surface contamination studies to be initiated soon under CH2M Hill (Rem/ F.I.T contractor). Chemical Waste Management submits for completion of the cleanup.

Table 1-2

SUMMARY OF ACTIONS CONTRACTED BY U.S. EPA
AT SEYMOUR RECYCLING CORPORATION

Date Began	Date Completed	Project Costs	Funding Source	Contractor	Actions Taken
3/30/80	5/2/80	$860K	311(k)	O.H. Materials	Drum staging and identification; surface water treatment system
4/3/80	4/24/80	$ 43K	311(k)	Darlage Co.	Spread crushed rock and dug a ditch around site to divert surface runoff
7/16/80	7/23/80	$ 35K	311(k)	O.H. Materials	Neutralized spill of plating acids from 10,000 gallon tank
8/13/80	8/21/80	$ 50K	311(k)	ACE Oil	Improved dike and drainage around site; sampled some bulk tanks; extended road outside of fence; repaired and extended fence
8/15/80	9/9/80	$ 14K	311(k)	KV Assoc.	Preliminary ground water contamination study
8/19/80	8/26/80	$ 40K	311(k)	ERG Lab	Analysis of tank samples
10/14/80	7/10/81	$722K	311(k)	Petrochem	Removal of liquids from bulk tanks (98)
5/1/81	2/16/82	$200K	311(k)	ESE, Inc.	Detailed ground water contamination study
4/1/81	2/1/82	FIT Contract $	FIT	E&E, Inc.	Off-site soil contamination study and determination of buried materials

2.0 NATIONAL PRIORITY LIST

The Hazard Ranking System (HRS)(1) scoring serves as a methodology to estimate the potential hazard presented by releases or threatened releases of hazardous substances to the environment. Included is an evaluation of the HRS scoring done by the Field Investigation Team (FIT) at the request of USEPA in order to develop the Interim Priority List (IPL). Candidate sites were originally scored by EPA-Regions and states, however, this scoring contained inaccuracies and hence the need to rescore the highest 175 sites using a more accurate and consistent approach. The IPL scoring was included in our evaluation because it represented EPA's first-cut at a list which would be used to allocate and schedule expenditures of CERCLA money.

HRS scoring of the site was done by the State of Indiana and used to establish the final National Priority List (NPL). This scoring was conducted in July 1982 by staff at the Indiana State Board of Health using records contained in their files. The HRS worksheets were submitted to the USEPA-Region V for quality assurance review and then transmitted to the On-Site Coordinator (OSC) at Seymour for comment. The HRS score for Seymour Recycling published in the September 8, 1983, "Federal Register" was unchanged from that generated by State of Indiana personnel.

2.1 IPL Ranking of Seymour Site

USEPA attempted to develop an interim list of the highest priority hazardous substance sites using candidate sites submitted by EPA-Regions and the states. These scorings were found to be inaccurate in terms of the guidelines for the Hazard Ranking System (HRS) when checked during a Field Investigation Team (FIT) quality assurance audit.

EPA requested the FIT, under a National Project Management Office TDD (No. HQ-8109-01), to rescore the highest scoring 175 sites based on submitted scores. Seymour Recycling was included in this rescoring of Superfund candidate sites.

The Hazard Ranking System (June 4, 1981, edition) as developed for assigning remedial action priorities was used to score sites. Only the first three subscores (groundwater, surface water and air) representing three of the five routes of exposure are combined to assign a total score for pollution potential. Total scores were used to generate the IPL.

A detailed breakdown of the HRS scoring by FIT follows. A worksheet which accompanied the Model Worksheets supplied documentation for the HRS scoring done by FIT. The Mitre Model Scoring of Seymour Recycling (1), which contains the model worksheets, is contained in Appendix 2.

Groundwater Pathway

Measured Level or Evidence of Release

A score of 45 was entered which indicates direct evidence (i.e., analytical data) of release of a substance of concern from the facility to groundwater. The documentation for this score did not identify the substance(s) or nature of the release but cited a method of measurement or observation i.e., information from the Final Report to USEPA - Analytical Data by O.H. Materials. The HRS worksheet contained the following statement, "Samples taken from wells on-site also storage tanks on-site and ponds on-site indicate ground water contamination."

The Executive Summary to the report by O.H. Materials (3) stated, "The existence of groundwater contamination (samples 878-34, -38, -43, -44) under the SRC site precludes any change in pumping from this aquifer which would cause the rate or direction of migration of contaminated water to change..."

Physical State

Physical state was assigned a site rating of 3 and a site score of 6. The documentation worksheet listed Sax 5th edition as the source of information. A rating of 3 is used for liquids, sludges, and gases. There was no documentation in the worksheet of the source of this information such as a waste inventory or other report.

Persistence

A site rating of 3 was assigned based on PCBs being the most persistent compound subject to transport via groundwater. The basis for this selection was that it was the highest rating compound found on-site. The Mitre tables were used for selecting the persistence rating score.

Toxicity/Infectiousness

The value for this combined factor was 3 and was based on an evaluation of several of the most hazardous substances at the facility. Five chemicals were listed in the documentation worksheet along with individual values for persistence and toxicity.

Chemical	Toxicity Assigned Value	Persistence Assigned Value
PCB	3	3
Chlorobenzene	3	2
Phenol	3	1
Cyclohexane	2	1
Benzene	3	1

The Mitre Report was cited as the source for the above values and samples taken of a pond on-site were used to confirm their presence.

Total Waste Quantity

The assigned value for this rating was five, which was the highest score that could be given. The documentation worksheet stated that 60,000 drums were on-site and also an undetermined amount of bulk storage. The source of this data was a memo from the OSC to the Regional Response Team indicating quantities on-site.

Groundwater Use

Groundwater use was scored as three, indicating that the aquifer of concern was used for drinking water. The documentation referenced a topographic map from the Indiana Department of Natural Resources (IDNR) which located residential wells still in use in the area. The downgradient direction was established from O.H. Materials' report to USEPA (3).

Distance to Nearest Well Downgradient

The highest rating score was assigned. The distance to the nearest downgradient well was approximately 2,000 feet as determined from a topographic map which located wells in the vicinity of SRC. Well logs verified that these wells were drawing from the aquifer of concern.

Population Served by Groundwater

A rating of 5 was assigned which translates to a site score for this target of 30. The worksheet documentation states that municipal wells are located approximately two miles east of the site and serve a population of approximately 17,920 people (4,716 connections x 3.8 people/connection = 17,920 people). Another 2,850 people were estimated to be on private wells within this three mile area. These population estimates are all well above the cut-off of 10,000 for an assigned value of 5.

Surface Water Pathway

Measured Level or Evidence of Release

The site score was 45 for an observed release to surface water. No description of the substances or nature of release was provided, however, the documentation cited samples taken of runoff in drainage ditches which showed contamination leaving the site toward Von Fange Ditch. No report was cited as the source for this information.

Waste Characteristics - Physical State, Persistence, Toxicity/Infectiousness

These three characteristics were all assigned a site rating of 3. No documentation specific to the surface water pathway was provided, however, it is assumed that documentation supplied for groundwater also applies to surface water.

Hazardous Waste Quantity

Total waste quantity was rated 5, and although no documentation was provided, it is assumed that the information provided under groundwater also applies to surface water.

Surface Water Use

The site rating for this target was given a value of 3 which is assigned for irrigation, economically important resources, commercial food preparation, or recreation. The documentation for this rating stated that at least recreational use was assumed.

Critical Habitats

Critical habitats was assigned a value of 0. The worksheet documentation stated that a phone call to the Indiana Department of Fish and Wildlife revealed that there are no critical habitats or endangered species in the area.

Population Served by Surface Water Within Three Miles Downstream

A site rating of 0 was assigned. The documentation stated that there are no water intakes within three miles downstream from the site and that the surface water does not have sufficient quantity for a surface water supply.

Air Pathway

Evidence of Release

Although this rating factor was eventually assigned a site score of 0, indicating no evidence of release, a preliminary worksheet (Appendix 1) included points for evidence of release. The final

worksheet, however, stated that documentation does not show airborne contaminants leaving the site and that measurable levels were near storage areas only. The source cited for this information on air was Bob Cibulski - ERT, Edison, NJ, and Charles Castel - USEPA-Region V.

A review of past correspondence, Indiana State Board of Health (ISBH) inspection reports, and newspaper articles revealed the following pertaining to air pollution:

- ISBH Inspection Report - 12/20/78 (4) performed at the request of USEPA-Region V
  - Seymour Recycling Corporation was issued an Air Pollution Control Permit for incineration on July 26, 1974.
  - The incinerator operated only intermittently from June 30, 1978 to December 30, 1978. The ISBH saw the use of the incinerator as a means to reduce the inventory of wastes on site.
  - The ISBH inspection report states that "Improper operation of the incinerator has been documented and numerous complaints have been received from surrounding residents."
  - A "New York Times" article dated March 3, 1983 (5) makes reference to numerous air pollution problems from 1975 to 1978.
  - A State of Indiana Environmental Management Board (EMB) report dated 12/15/78 (6) stated (page 8) that "the agency has received several complaints from residents in the area relative to operation of the incinerator at Seymour Recycling." The report also documents problems with the scrubber system of the incinerator and recommends that operation of the incinerator be discontinued unless certain requirements are met (pages 9 and 10).

2.2 NPL Ranking of Seymour Site

The Hazard Ranking System (HRS) scoring used for the National Priorities List (NPL) was done by the Indiana State Board of Health. A copy of the HRS Worksheets and Documentation Records were obtained from files at the Indiana State Board of Health. In addition, a visit was made to the public docket for the National Oil and Hazardous Substances Contingency Plan (NCP) at USEPA in Washington, D.C., and a copy of the HRS score sheets and "Documentation Record" for Seymour Recycling were obtained. The

score sheets from both sources were identical. An analysis of the HRS scoring for the NPL is contained below and a copy of the HRS score sheets and "Documentation Record" are contained in Appendix 2.

Groundwater Pathway

Observed Release

The assigned value for observed release was 45 indicating direct evidence of release from the facility to groundwater existed. The documentation for this rating factor identified two contaminated aquifers - one at 10-25 feet and one at 65-75 feet. Contaminants identified in the shallow aquifer were chloroform, vinyl chloride, benzene, methyl bromide and trichloroethane. Contaminants detected in the deep aquifer were phenol, phtalates, vinyl chloride and chloroform. The reference for this data was a report prepared by Environmental Science and Engineering, Inc. (ES and E) for the U.S. Coast Guard (7).

The report by ES and E states that their analyses of groundwater samples from the shallow aquifer under the field north of Seymour Recycling (SRC) showed organic chemicals from SRC at levels up to 1,240 micrograms per liter (ug/1). Chemicals which were detected included trichlorethane, methyl bromide, chloroform, benzene, trans 1,2- dichloroethylene, vinyl chloride, ethyl benzene, phthalates, and trace levels of dozens of other organic compounds. Vinyl chloride was found at the downgradient well nearest SRC at 1,240 ug/1 which is significantly higher than the standard of 20 ug/1. The deep aquifer under the field north of SRC contained traces of phenol, phthalates, vinyl chloride, and chloroform.

The rationale provided in the HRS documentation for an observed release was as follows: "This is primarily an agricultural area and SRC is the only facility in the immediate area that could possibly cause this contamination plus result of the report." (7).

This report documented that SRC is underlain by a shallow, sandy soil formation 10-25 feet below the surface which carries the shallow aquifer beneath the site. SRC is also underlain by a deep, sandy formation generally between 65-75 feet below the surface which carries the deep aquifer beneath the site, and supplies water to the Freeman Field Airport well field. The report further states that the direction and rate of flow of the shallow aquifer is heavily influenced by surface topographic features and, since there is no impermeable layer shielding this aquifer from direct infiltration of precipitation, recharge occurs in all elevated areas, including SRC. A downward hydraulic gradient was shown between the upper and lower aquifers with the upper aquifer eventually recharging the lower aquifer.

The technical information provided in the ES and E report provided sufficient analytical data and a hydrogeologic evaluation to justify the scoring of the groundwater as an

observed release.

Waste Characteristics

Toxicity/Persistence. The waste characteristic rating factor was assigned a value of 18 for toxicity/persistence. The compounds evaluated for this combined factor were:

- PCBs
- Hexachlorocyclopentadiene (C-56)
- Cresol
- Phenols
- Epichlorohydrin

The documentation records attached to the score sheets do not provide information on the scoring for the individual compounds but do list hexachloroyclopentadiene (C-56) as the compound with the highest score.

Our review of the various contractor and government agency reports revealed documentation of the presence of these compounds at SRC. The NEIC report of January 1980 (8) provides some of the earliest documentation of the presence of organics on-site. This study involved an on-site inspection to identify operating procedures and site morphology, select sampling station locations, and obtain information identifying on-site materials. Liquid and soil samples were collected from locations within the plant, the drainage ditch surrounding the SRC site, nearby wells and the City sewers downstream of SRC. No samples were taken from drums or tanks on-site. The report documents the presence of hexachlorocyclopentadiene (Hex) on-site and cautions as to the possible hazards the presence of this compound stored on-site presents due to its extreme toxicity. The report documents the presence of 41 organic compounds in collected samples, of which 25 were priority pollutants.

The organic compounds were evaluated for toxicity and human health effects by searching established data bases. The identified compounds demonstrated numerous health effects including carcinogenic, central nervous system, blood, systemic, psychotropic, gastrointestinal, mutagenic, irritant, teratogenic and neoplastic effects.

Hazardous Waste Quantity. This rating factor was scored as an 8, which is the highest score that can be assigned. The documentation records list an estimated waste quantity of 60,000 drums and 100 bulk tanks based on EPA estimates. The total quantity necessary for an assigned value of 8 is an estimate of greater than 10,000 drums. The EPA estimate was reasonable based on the documentation we have seen and a score of 8 can be justified.

Targets

Groundwater Use. Groundwater use was scored as drinking water with no municipal water from alternate unthreatened sources presently available. The documentation records stated that both aquifers were used for drinking water. The 1982 report by ES and E (3) provides the clearest documentation of the groundwater use in the area of SRC. The report states that both the shallow aquifer (10-25 feet) and the deep aquifer (65-75 feet) are drinking water sources for the residents within a three-mile radius of the site.

Distance to Nearest Well/Population Served. This rating factor was scored as 40 based on the distance to the nearest well and the population sized served by groundwater wells withing a three-mile radius. The documentation records list the nearest well drawing from the shallow aquifer as the Golf Course well located 1,200 feet WNW of the site. The population served by the shallow aquifer was estimated at 380 based on 100 homes with 3.8 residents per dwelling. The nearest well that draws from the deep aquifer was listed as the City Well, which is located 1,200 feet NE of the site and serves a population of over 10,000 people.

The ES and E report provides the best documentation on the water supply in the area of SRC. The description of well locations and population in the ES and E report tracks the information contained in the documentation records.

Surface Water Pathway

Observed Release

This rating factor was given a value of 45, indicating direct evidence of release to surface water. The documentation records list three contaminants detected in surface water: Cadmium, Mercury and Arsenic. The rationale for attributing these contaminants to the facility was stated as follows: "No other source for this chemicals plus the water receives runoff from site." The U.S. Fish and Wildlife Service (9) was cited as the source for this information.

The U.S. Fish and Wildlife Service study in August of 1980 involved sediment and fish sampling at seven stations in the vicinity of SRC. The analytical data showed elevated levels of heavy metals, especially mercury, in the sediments. The intermittent nature of these streams makes actual sampling of surface water difficult and the existence of elevated levels of metals in the sediments can reasonably be taken as evidence of release.

Waste Characteristics

Toxicity/Persistence. This rating factor was assigned a value of 18 and was scored the same as the groundwater route. The documentation records referred back to the groundwater section for justification. Based on the instructions for the HRS

42-590 O—85——6

scoring, this is a reasonable procedure to score groundwater and surface water the same.

Hazardous Waste Quantity. This factor was scored the same as groundwater and the justification for groundwater was referenced for scoring documentation. Based on the instructions for the HRS scoring and the documentation provided, the similar scoring is justified.

Targets

Surface Water Use. Surface water was assigned a value of 2 for recreation (e.g., fishing, boating, swimming). The documentation record cites recreational uses in the White River as justification for this rating.

The records reviewed by us do not indicate any drinking water supplies within three miles of the site, therefore, a ranking for recreational use is justified.

Distance to a Sensitive Environment. This factor was scored as 0 and the documentation record indicated the absence of a coastal wetland, freshwater wetland, critical habitat of an endangered species or national wildlife refuge in the proximity of SRC. We have found no evidence to refute these justifications.

Population Served/Distance to Water Intake Downstream. A value of 0 was assigned which indicated the absence of water supply intakes within three miles downstream of the site. We have found no evidence to refute this particular scoring.

Air Pathway

Observed Release

The assigned value for observed release was 0, indicating no direct evidence of an airborne release of contaminants from the facility. The Users Manual for the HRS states that the only acceptable evidence is data that show levels of a contaminant at or in the vicinity of the facility that significantly exceed background levels regardless of frequency.

Our review of State files on Seymour indicated a lack of documented evidence of an air release, however, the correspondence and memos contained in the files suggested that airborne releases were commonplace at SRC. Contact was established by telephone with State and Federal officials involved in the Seymour Recycling case to confirm the absence of air monitoring data which could have been used to document an observed release.

USEPA Contacts

Beverly Kush (OSC at Seymour) said that, to her knowledge, no ambient air monitoring had been conducted before the present cleanup. However, she suggested that contact be made with the following EPA staff who were involved at Seymour prior to her coming on-site:

(1) Charlie Castle - former OSC at Seymour, and
(2) John Gilbert - Emergency Response Team

Charlie Castle was OSC from August, 1980, to June, 1981, and said that he had no knowledge of air monitoring before August, 1980. He also indicated that the only air monitoring done during his tenure as OSC was spot checks for personnel safety reasons. These checks, performed on-site, showed that OV (Organic Vapor) masks were all that was required. Mr. Castle said that in 1980 when EPA was on-site, the incinerator was not operating.

John Gilbert is on the Emergency Response Team out of Edison, New Jersey. John said that the Seymour assessment took place before equipment and methodologies were available to monitor airborne contaminants. Mr. Gilbert confirmed that OVA equipment was used on-site but no adsorption tubes were used at Seymour. He said that EPA tried some portable air monitoring equipment but it was experimental.

Petrochem Services, Inc. (10) details a cleanup operation initiated in October 1980 and provides some information on air monitoring performed under Castle's term as OSC. According to Petrochem's report, "upon arrival at Seymour the areas immediately adjacent to the tanks were checked for toxicity in air using a TLV meter and Drager Tester. No detectable levels were found using Drager tubes for Phenol, Carbon Tetrachloride, Benzene, Hydrogen Cyanide, Hydrogen Sulfide, and Toluene. The TLV Toxicity Meter reading ranged from 0-50 ppm. Given the type of instrument (one which nonselectively reads combustible gases down to 1 ppm) this range was expected. Based on these readings a preliminary personnel protection level was set; personnel were outfitted with carbon filter breathing masks (good for 1000 ppm contamination for eight hours), protective rain gear, face shields, gloves, and rubber boots."

State Contacts

John Doss (Indiana State Board of Health - Air Pollution Control Division) said that his agency was never able to conduct stack testing at Seymour Recycling. Tests were planned at various times but the operation (i.e., Seymour Recycling) was not smooth-running and the State could never predict when Seymour might be operational. John suggested that contact be made with Dick Zeller - Chief of Ambient Sampling at the State Board of Health to verify if any ambient air samples had been collected.

Dick Zeiler stated that the Indiana State Board of Health has not conducted any ongoing ambient air sampling at Seymour Recycling, however, they did conduct a limited duration "special study" at Seymour Recycling. According to Mr. Zeiler this study consisted of a few hours of sampling using a Hi-Vol sampler. This study was done well before cleanup operations had been initiated. Mr. Zeiler has been unable to find the report of the analyses of the filters from these "special studies", therefore, we are unable to say for certain whether or not data may exist to document an observed release.

Comments

If data did exist which documented an observed air release at Seymour then in the HRS score, Observed Release would be scored as 45, Waste Characteristics would receive the maximum score of 20, and the Total Targets Score would probably be at least 24 (depending somewhat on population density and proximity to Seymour Recycling). The Air Route Score (Sa) would be 61.54 based on the above rating factor scores. The New Migration Hazard Mode Score, SM, using the State's values for Sgw and Ssw and 61.54 for Sa would be 68.16 versus the NPL score of 58.15 which did not take into account an observed release to the air route. However, since Seymour was the top NPL site in Indiana, the change of score would have had negligible impact regarding remedial actions.

Based on the review of the reports submitted by the various consultant contractors and the State of Indiana, it appears that only data collected by USEPA or its contractors was used to determine the HRS Scoring and resulting priority listing. Little or no information collected by ISBH was actually used. This was especially true for the air pollution problem.

HRS scoring done at Seymour and other Indiana sites could not be compared to ascertain whether air pollution evaluation was done consistently for all sites. Further review of the HRS Scoring summary prepared in October, 1981, by E and E did not give any points to air pollution, citing that documentation of measurable levels occurred at the site only and these levels were not found off the site. Information supporting this came from Bob Cibulski (ERT, Edison, NJ - USEPA) and Charles Castle - USEPA-Region V.

It appears, based on the review of reports done, that little or no sampling for air pollutants was done. Occasionally, reference is made to volatilization of priority pollutants and their potential for air pollution but no specific sampling was done. The reason for this was probably because the incinerator was shutdown in 1978.

The six Indiana sites on the National Priority List were rescored by the FIT contractor in 1981 (11). These sites are listed below along with their FIT score and rank and original score and rank.

SITE	FIT SCORE	ORIGINAL EPA/STATE SCORE	FIT RANK	ORIGINAL RANK
Seymour Recycling	58.24	45.97	33	95
Neal's Landfill	49.07	49.37	76	83
Midco I	26.76	65.00	129	24
Neal's Dump	23.24	38.17	137	132
Wayne Recycling	17.06	30.64	144	163
Lemon Lane Landfill	7.54	37.94	167	133

REFERENCES

(Chapter 2)

(1) "National Oil and Hazardous Substances Contingency Plan - Appendix A". Uncontrolled Hazardous Waste Site Ranking System - A Users Manual, "Federal Register" Vol. 47, No. 137, June 16, 1982.

(2) "Mitre Model Scoring of Seymour Recycling". "Ecology and Environment", October 23, 1981.

(3) "Final Report to USEPA - Analytical Data - Seymour Recycling Center". O.H. Materials Co., June 13, 1980.

(4) Inspection Report - Seymour Recycling Corporation - December 20, 1978. Indiana State Board of Health.

(5) "$7 Million Settlement for Cleaning Up Hazardous Waste Dump Draws Fire." "New York Times", March 3, 1983.

(6) Compliance Report to Indiana Attorney General - Environmental Management Board, December 15, 1978.

(7) "Groundwater Contamination Study - Seymour Recycling Center," Environmental Science and Engineering, February 18, 1982.

(8) "Field Investigation for Imminent Hazard Assessment - Seymour Recycling Company - November 14-15, 1979". National Enforcement Investigation Center, January 1980.

(9) "Contaminants in Sediments and Fish in the Vicinity of Seymour Recycling Corporation," Environmental Contaminants Evaluation, U.S. Fish and Wildlife Service, March 9, 1981.

(10) "Final Report - Tank Phase Clean-up Contractor - Seymour Recycling Corporation," Petrochem Services, Inc., August 28, 1981.

(11) "Final Report - Rescoring of Superfund Candidate Sites Using the EPA Hazard Ranking System," Ecology and Environment, Inc., October 15, 1981.

3.0 ANALYSIS OF ALTERNATIVE CLEANUP APPROACHES

This chapter analyzes the alternatives which were considered for the cleanup at Seymour. Included are (1) discussion of the various cleanup approaches considered for the Seymour hazardous waste site; (2) evaluation of the USEPA-State interaction and the qualifications of contractors and consultants who took part; (3) assessment of the impact of short-term containment versus long-term permanent cleanup on the choice of alternatives; (4) identification and explanation of unsatisfactory alternatives; (5) analysis of the effect of emergency removal actions on the alternative cost-effectiveness study; and (6) an evaluation of how the perception of cleanup goals affected the evaluation of alternatives. Much past correspondence, newspaper articles, the settlement agreement, reports, and the final technical proposal were carefully reviewed in making this assessment. USEPA and Indiana State Board of Health personnel were contacted, as well as the generator trustees and the cleanup contractor, to get their observations, views, and opinions.

Almost all persons contacted, and especially the generator trustees, stressed that the unique agreement worked out at Seymour for a surface cleanup short-cut the time it would have taken for a federally-funded cleanup by many months. However, the generator-funded surface cleanup falls short of the comprehensive cleanup required under the National Contingency Plan (1). Several administrative and procedural issues, listed below, appeared to significantly influence the type of cleanup that was finally instituted:

- The settlement agreement (2) grants generators who sign it immunity from future subsurface liability. The group of 24 generators apparently felt it was worth paying a one-time, fixed cost for cleanup, than to pay piecemeal for an undetermined total cost for an undetermined amount of time.

- The agreement was finalized in late fall, 1982, just prior to the effective date of the National Contingency Plan, which was promulgated on July 16, 1982. Had the National Contingency Plan been in effect, a comprehensive surface/subsurface cleanup settlement agreement would have been required. This would have required many more negotiations over a long period of time.

- Superfund financing of the Seymour cleanup was not sought because the State of Indiana would have to pay 50 percent of the total cleanup cost of approximately $30 million. This matching share ($15 million) was not available. The generator

funded cleanup appeared to be the only way to get the cleanup underway to reduce the threat to local residents.

Most of the objections to a total, comprehensive cleanup were from a procedural or administrative point of view, i.e., let Superfund clean it up or let the State pay. However, certain technical issues did come into consideration which limited the cleanup to the surface only:

- The cost estimates for cleanup ($15.5 million surface; $15 million subsurface) were viewed as unrealistic (i.e. overly conservative) by the generators. The surface cleanup finally agreed to have a total cost of only $7.7 million.
- The deteriorated state of storage facilities, tanks, and drums mandated immediate action.
- Evidence of groundwater pollution based on pre-cleanup sampling was not detailed enough to establish a specific plan for subsurface cleanup.
- The generators felt that the sewer leading from the site was severely deteriorated and might be a "seep" for groundwater (3). Rehabilitation of the sewer was not made part of this settlement agreement.
- The surface and stormwater treatment facility constructed by a previous contractor during early, remedial actions was viewed by the generators as completely inadequate (3). As with the sewer, the treatment facility was not considered part of the surface cleanup.

3.1. Alternative Clean-Up Approaches

The original surface cleanup cost estimate was prepared in 1980 by Ecology and Environment, Inc. (4), USEPA Region V's F.I.T. (Federal Investigation Team) contractor, and was a "worst case" estimate totalling approximately $15.5 million. The total cost estimate was broken down as follows:

Surface Cleanup Cost Estimate

I.	Containment Berm Repair	$ 2,000
II.	Initial Cleanup (bulk material and hydrogeologic investigation)	465,000

III.	Intermediate Phase (analysis, removal, and disposal of drummed waste)	8,169,000
IV.	Mitigation and Elimination of Contaminants (removal and replacement of 5 feet of contaminated soil)	4,938,000
V.	Labor Costs	500,000
		$14,124,000
	Contingency - 10 percent	1,412,400
		$15,536,000

Items I and II were done prior to the generator-funded cleanup by various contractors.

The Ecology and Environment report also discussed several other alternatives for cleanup of the site but rejected them for various reasons. Among these other alternatives were:

- incineration of organic solvents in cement kilns - although E and E showed that incineration in this manner was more cost-effective, they felt it was not feasibile to do because of public reaction.
- on-site incineration - not considered because of public non-acceptance and permitting; and
- on-site neutralization rejected because of inherent safety problems (mixing acids and cyanides). After a site evaluation they felt that on-site treatment could be done if safety precautions were ta en.

This off-site disposal plan was basically adhered to by the cleanup contractor (5). However, several technical modifications were negotiated by the generators and USEPA which significantly reduced the cleanup costs but did not appear to reduce the effectiveness.

- The selected cleanup plan used a sampling program of "fingerprinting" each drum of wastes and combining them on-site for transport in full containers off-site. This reduced the number of loads to be transported.
- The "fingerprint" sampling program segregated the wastes into seven compatible batches - ignitables, corrosives, acids, caustics, reactives, cyanides and sulfides. Non-reactive liquids and solids were also segregated. For disposal and permitting, a composite sample of each batch was analyzed prior to off-site transport. This procedure saved hundred of hours of laboratory time and resulting

costs and did not appear to omit any vital information.

- The amount of contaminated soil removed and replaced was significantly reduced. This was an amount negotiated by the generators and USEPA and appears to have been done quite arbitrarily. There are no technical reports or correspondence that discuss this point. The Canonie Report (11) does make a case for less subsurface contamination and could have been used by the generators to negotiate a lesser amount. Canonie concluded that the soil on the site was essentially impervious and that all the drilling and unsealed monitoring wells were in themselves a source of groundwater contamination. The Ecology and Environment report estimated the removal, disposal and replacement of five feet of soil from the 13-acre site, or 105,000 cubic yards, at a cost of $5,000,000. E and E chose 5 feet based on their knowledge of the soil and the probable extent of soil contamination. The final cleanup plan specified the removal of only a one-foot depth of soil over 58 percent of the site. From CWM's records, this amounted to 14,300 cubic yards of material from the 13-acre site and is estimated at approximately $676,000.

A report which details the cost estimate for the subsurface cleanup ($15MM) could not be located and many persons contacted doubted its existence. The only cost estimate located was a hand-written memo in the files of the ISBH which gave a cost estimate of $15.7 MM, itemized as follows:

Total cleanup cost	$30MM
Surface Cleanup	$11.9MM
contingencies - 20%	
surface cost	$13.8MM
Subsurface	
investigations	$ 300,000
clay liner	5,000,000
surface cap	1,900,000
surface water treatment system	314,000
20 year maintenance	750,000
20 year operation	500,000
analytical work	5,760,000
	$14,323,000
10% contingency	1,432,000
	$15,683,000

Subsurface cleanup alternatives were analyzed by ES and E (6), in its February 1982 report, in which several alternatives were proposed for capping the site and restricting further groundwater contamination. Alternatives which were analyzed included:

- Groundwater containment
  - slurry trench - 10 feet wide
  - thin slurry trench - 4 inches wide
- Impervious cap
  - compacted clay
  - asphalt
  - synthetic liner
- Treatment
  - central treatment system
  - individual tap filters at residence
- Alternative water supply
  - extend municipal system
  - drill new wells

Each alternative was discussed in depth, the local impact on the pollution problem presented, and construction and 20 years' maintenance costs estimated. Environmental and public acceptability were also considered and a comparison table of cost maintenance, construction time, permeability, compatibility, feasibility, and local impact developed.

A slurry wall trench around the site and an impervious cap were recommended at a total cost of $1.9 MM, much less than the $15.7MM subsurface cleanup estimate. However, since the extent of on-site contamination could not be determined, these recommendations were not implemented. They may, however, be used in conjunction with the results obtained from further subsurface investigations when Phase II (subsurface cleanup) is begun.

3.2. USEPA - State Interaction and Contractors' Qualifications

USEPA-Indiana State Board of Health relations were somewhat strained and interactions were limited during the emergency and remedial action cleanups in 1980-1982. This problem was due, for the most part, to restrictions on the Coast Guard 311 money available for the cleanup, which did not allow for removal and disposal of the material off-site. The ISBH felt that the money should have been used to remove the drums.

Based on conversations with both USEPA (7) and the Indiana State Board of Health (8), there appeared to be only limited interaction between the two agencies in the evaluation of the cleanup proposal. The cleanup contractor, Chemical Waste Management, Inc. (CWM), was selected from among a group of three cleanup firms by the generator group. The cleanup agreement was negotiated directly between the generators and USEPA. Toward the end of negotiations, both the Indiana State Board of Health and CWM were brought into the talks to get final agreement on the proposed scope of cleanup. It appears the State chose a passive role during these negotiations because of their relatively ineffective dealings with SRC during the mid to late 1970's. They also did not have the financial or personnel resources to effectively devote to the Seymour project for lengthy periods of time.

Cleanup proposals were sought only from firms which were highly reputable and experienced in removal and disposal of hazardous waste. The selected cleanup firm, Chemical Waste Management, Inc., was eminently qualified to perform the work. The actual work was performed by ENRAC (Environmental Remedial Action), a major nationwide division of Chemical Waste Management, Inc. A primary reason for choosing Chemical Waste Management was its ownership of many secure disposal sites throughout the country (of which six were specifically listed as the disposal sites for the wastes from Seymour) and its equipment and operating experience for removing and transporting chemical wastes.

Consultants and contractors previously employed at the site included O.H. Materials, Petrochem Services, Inc., Ecology and Environment, Inc. (E and E), Environmental Science and Engineering (ES and E), Canonie Environmental Services Corp., K.V. Associates, the National Enforcement Investigations Center (NEIC), and U.S. Fish and Wildlife Service. The tasks they performed, dates of work, and a brief summary of the work is shown in Table 3-1.

All of the contractors used for the emergency and remedial actions had extensive experience in hazardous waste cleanup projects and appeared to be well qualified to do the work. However, limitations on the amount of money available and the restrictions on its use (i.e., no off-site material disposal) may have hampered their effectiveness.

Table 3-1

Contractors and Consultants
Seymour Hazardous Waste Site

CONTRACTOR/CONSULTANT	TASK/DATE	SUMMARY OF WORK
A. Contractors		
1. O.H. Materials and various subcontractors	drum restaging, berm installation, wastewater system constructed Spring 1980	effectiveness of cleanup limited; restaged drums were not sampled and were grouped according to their suspected contents; bermed area appears to be a source of subsurface contamination (see ES and E - Feb. 1982)
2. O.H. Materials	removal of IBM and Cummins wastes - Spring 1980	materials disposed of at a Chemical Waste Management Facility in Calumet City
3. O.H. Materials	cleanup of acid spill - Summer 1980	acid neutralized on-site
4. Petrochem	removal of bulk wastes and sludges to Cincinnati MSD for incineration - Fall 1980	wastes disposed of by incineration
B. Consultants		
1. NEIC	initial site evaluation - Jan. 1980	on-site inspection; liquid and soil samples; did not confirm well water contamination; documented access to site
2. O.H. Materials (Toledo Testing Lab - subcontractor)	GC-MS analysis of 286 samples on and off-site of groundwater - Spring 1980	Documented subsurface contamination on-site; could not define the extent of contamination off-site; determined direction of flow to north-northeast; test pits dug on-site

Table 3-1 (Cont'd)

Contractors and Consultants
Seymour Hazardous Waste Site

CONTRACTOR/CONSULTANT	TASK/DATE	SUMMARY OF WORK
B. Consultants (cont'd)		
3. K-V Associates	subsurface investigation - Summer 1980	site hand augered to depths of 8-9 feet; documented a plume of contaminants moving off-site to north-northwest; sampled for petroleum and conductivity
4. E and E	cost estimate of surface cleanup - Summer 1980	cost estimate; surface cleanup only; included five feet of contaminated soil removal and disposal from the entire site
5. U.S. Fish and Wildlife	sediment and stream survey - March 1981	fish and bottom sediments were collected from several sites; contamination was documented relative to heavy metals, organics, phthalates and phenols
6. E and E (including subcontractors - Battelle Northwest; A&H Drilling; Mead Technological; and Rocky Mountain Analytical)	extent of soil contamination and location of buried material - Feb. 1982	located buried material on-site; detected a plume of pollutants moving off-site from the bermed area
7. ES and E	groundwater contamination study - Feb. 1982	18 groundwater monitoring wells were installed; shallow groundwater detected; migration rate determined; organic chemicals were detected in both shallow and deep aquifers; alternatives were evaluated and a slurry wall and impervious cap recommended to isolate the contamination

Table 3-1 (Cont'd)

Contractors and Consultants
Seymour Hazardous Waste Site

CONTRACTOR/CONSULTANT	TASK/DATE	SUMMARY OF WORK
B. Consultants (cont'd)		
B. Canonie Environmental	evaluation of site conditions - July 1982	review of previous reports and a site visit; indicated no significant migration of materials; stated groundwater flowed north to southwest; suggested that other sources upstream from SRC may be responsible for discharge of chemicals into surface waters; groundwater contamination may be the result of improperly installed monitoring wells

The consultants employed on the project were also well qualified. However, the temporary monitoring wells installed in 1980 by a subcontractor to O.H. Materials (9) were constructed improperly, never fully developed, and yielded little useful data. ISBH officials also felt that the 1981 U.S. Fish and Wildlife Service study (10) of nearby streams and sediments was of limited usefulness. This study of fish and sediments at several upstream and downstream points was inconclusive. The range of values for priority pollutants for three upstream (from SRC) sites was not significantly different from the range for three downstream sites. However, a fourth sample site located 0.8 miles east of the SRC site (upstream) showed significantly higher values for most of the priority pollutants in sediment and could indicate another source of pollution. Because of these conflicting values, the results of the report were not used.

Another subcontractor, A and H Drilling, which installed monitoring wells as part of the E and E study dated February 1982, was not registered with the State of Indiana. However, their qualifications and experience appear to be acceptable for the type of work which was done.

The Canonie Report (11), dated July 1982, which was paid for by the generator group, assessed the earlier consultant reports concerning the extent, migration, and contamination of the groundwater. It concluded that no significant migration of materials was occurring due to the groundwater and suggested that upstream sources from Seymour might be responsible for surface water pollution. This report also discounted the U.S. Fish and Wildlife Service report for the same reasons as stated above, and stated that the early, improperly installed monitoring wells and test pits (O.H. Materials - 1980) could be sources of groundwater contamination. Because of its significantly different conclusions concerning the source and extent of groundwater contamination at SRC, both Indiana and USEPA officials discounted this report and stated that it had no impact on the type of settlement agreement reached with the generators.

3.3. Evaluation of Cleanup Approaches (Short-Term versus Long-Term)

The cleanup approach instituted during 1983 by the group of 24 firms is essentially a permanent solution to the surface hazardous waste problem at Seymour. A chronological review of events during the late 1970's clearly shows that short-term solutions were inadequate to remedy the problems at Seymour.

The first federal measures were begun in March 1980 and consisted of constructing new berms, restaging drums, installing monitoring wells, and installing a wastewater pretreatment system. These

measures did not reduce the threat of spontaneous ignition or tank rupture. Even when the major generators removed their wastes from the site, a dangerous situation still existed. In working out the final settlement, it was agreed that only off-site treatment and disposal of the stored wastes would be adequate.

Also, the wastewater treatment system, which consists of large diameter concrete pipes filled with activated carbon, did not work properly. As a result, the generator trustees (3), would not accept overall responsibility for operation of the stormwater management system. The ISBH also indicated that the groundwater monitoring wells may have been incorrectly drilled, and the data yielded of a very questionable nature (8). Because of this, the groundwater data became a source of dissention and, as a result, a comprehensive subsurface cleanup plan could not be agreed to by the generators.

3.4. Unsatisfactory Alternatives

40 CFR 300.70 (1) lists various methods which could be considered for response action. General alternatives include on-site actions, off-site disposition, provision for alternative water supplies and relocation. All on-site alternatives, except for surface water controls, were considered unsatisfactory. These are discussed in general below:

Air Emissions Controls. The surface cleanup alternatives included air sampling for volatile organics and a contingency plan for health protection in case excess concentrations were detected. The sampling consisted of an intensive background study, a normal routine program, and response sampling occurring as necessary. A fixed sampler was installed off-site downwind of the site and at the field laboratory. Movable samplers were used at various on-site locations. The potential air pollution problem was not severe enough to warrant more stringent actions.

Surface Water Controls. Various surface sealing alternatives were evaluated by ES and E in its February 1982 report (6), and an asphalt impervious cap and slurry wall recommended for the site. This alternative was rejected, however, since the extent of on-site soil contamination was unknown. Depending upon the results of these investigations, a surface sealing system may be reproposed.

Ground Water Controls. Because on-site groundwater contamination could not be documented, remedial groundwater alternatives were not considered.

Contaminated Sewer Lines. Remedial measures for these lines were not considered, even though they were old and known not to

42-590 O--85---7

be in good condition. Since they were below grade, they were considered to be part of the subsurface cleanup. The generators, however, felt contamination might be occurring, and thus did not make them part of their liability.

On-Site Treatment Technologies. None were acceptable. Recycling had been done in the past and very little material remained that could be disposed of in this manner. (NOTE: A small quantity of recyclable wastes was found during the cleanup and it was recycled.) On-site incineration had also been considered by the ISBH. The length of time required to permit the operation and the problems caused by the operation of the old incinerator made this alternative unacceptable. (NOTE: On-site solidification of an ignitable waste which was found during the cleanup was done as part of a change to the consent decree.)

Alternative Water Supplies. Alternatives were evaluated by ES and E (6) and an alternative water supply was recommended in the Canonie report (11), however, this alternative was not considered since direct evidence supporting well contamination could not be documented.

Relocation. The overall total impact of the Seymour site on the environment was not serious enough to warrant permanent relocation of neighboring residences.

3.5. Evaluation of Emergency Removal Actions

The work done by O.H. Materials and its subcontractors in the Spring of 1980 (drum restaging and berm construction) was of limited benefit. While it did allow for a more accurate inventory of the material on-site, which probably allowed for a better cost estimate for removal and disposal of the waste by Chemical Waste Management, drums were not grouped together according to contents as was claimed, and the area where they were staged was later thought to be a source of groundwater contamination.

The only contractor removal action which directly impacted on the surface cleanup cost estimate, was the removal of the waste owned by IBM and Cummins. No soil was removed with the drums, hence the total cleanup cost estimate was not proportionately reduced. In addition, since this removal occurred after the E and E report was prepared, which was the cost estimate used to apportion the cost per generator, it does not appear that this estimate was subsequently reduced by the amount spent by IBM and Cummins (about $1.2 MM).

3.6. Effect of Specific Cleanup Goals on Evaluation of Alternatives

In ultimately selecting off-site treatment and disposal for the waste and contaminated soil from Seymour, all the parties involved essentially agreed that a complete surface cleanup was necessary. Certain technical points relative to groundwater sampling data and surface water containment and treatment, already discussed, made agreement for a subsurface cleanup impossible. Any future subsurface cleanup, for which the group of 24 will incur no liability, appears to indicate that these generators felt the long-term costs could be significant, the length of time to implement and conduct the subsurface cleanup could be great, and a practical termination point ("how clean should the site be") could not be precisely defined.

The surface cleanup alternative specified the removal of five feet of contaminated soil from the whole site, but did not specify a degree of residual contamination allowable. The negotiated agreement, however, included removal of only one foot of contaminated soil from approximately 58 percent of the site. This one-foot-depth appears to be an arbitrary limit agreed to between the generators and USEPA. There were no analyses or risk assessment done to arrive at this number, but it obviously affected the cost of the surface portion of the cleanup.

REFERENCES

(Chapter 3)

(1) National Oil and Hazardous Substances Contingency Plan - Federal Register, Feb. 16, 1982.

(2) Settlement Agreement - United States of America vs. Seymour Recycling Corporation, et al, Oct. 26, 1982.

(3) Personal Communication - Robert Morris.

(4) "Clean-Up/Mitigation Cost Estimate for Seymour Recycling Center", Ecology and Environment, Inc., August 1980.

(5) "Technical Proposal for the Removal and Disposal of Drummed Hazardous Chemicals and Waste Materials Located at Seymour Recycling Center, Seymour, IN," Chemical Waste Management, Oct. 19, 1982.

(6) "Groundwater Contamination Study - Seymour Recycling Center", Environmental Science and Engineering, Feb. 18, 1982.

(7) Personal Communication - Beverly Kush, USEPA, On-Scene Coordinator.

(8) Personal Communication - Jim Hunt, Indiana State Board of Health.

(9) "Final Report to USEPA - Analytical Data - Seymour Recycling Center", O.H. Materials Co. June 13, 1980.

(10) "Contaminants in Sediments and Fish in the Vicinity of Seymour Recycling Corporation", Environmental Contaminents Evaluation, U.S. Fish and Wildlife Service, March 9, 1981.

(11) "Evaluation of Site Conditions and Remedial Work Requirements - Seymour Recycling Center", Canonie Environmental Services Corp., July 12, 1982.

4.0 EVALUATION OF CHOSEN CLEANUP TECHNOLOGY

This chapter evaluates the implementation and effectiveness of the chosen cleanup technology employed at the Seymour Indiana hazardous waste site related to protection of public health and the environment. This evaluation is made in terms of the following factors:

- quality of the design and construction work;
- effect of remedial actions prior to the cleanup;
- plan to determine long-term effectiveness of the program;
- quality of contractors and consultants;
- comparison of actual versus estimated time and cost estimates;
- availability of health and environmental effects information and their use;
- extent to which program meets original cleanup goals and standards;
- assessment of changes in agreed-to cleanup plan;
- public participation interaction;
- State and Federal interactions;
- extent of State effectiveness in dealing with long-term technical and economic responsibilities.

In addition, since the National Contingency Plan (NCP) was not fully implemented at the time of this cleanup, an analysis is included that attempts to identify what would have happened differently.

Correspondence and technical reports were reviewed and telephone contacts and interviews were made with the cleanup contractor, USEPA and Indiana State Board of Health personnel as well as persons from the Seymour area. Monthly progress reports, submitted by the cleanup contractor, were also be reviewed to get a clear understanding of the steps that were taken to complete the cleanup task.

The cleanup of the Seymour hazardous waste site began in early 1980 and included efforts to re-stage drums, and install monitoring wells and a wastewater treatment system. An estimate of total cleanup costs (surface and subsurface) made at that time totaled $30 million. Further investigations and remedial actions, including removal and disposal of several thousand drums and bulk liquids, continued over the next two years until the $7.7MM generator-funded cleanup began in November 1982. Except for some final site grading, the surface cleanup has essentially been completed as of January 1, 1984 and Phase II soil and subsurface investigations have begun.

The following analysis applies only to the surface cleanup and early remedial work done at Seymour.

4.1. Quality of Design and Construction Work

Chemical Waste Management's ENRAC Division performed the site cleanup of Seymour Recycling according to a scope of work that met with EPA approval. The Scope of Work included all items necessary to identify, collect, package, transport, treat and dispose of drummed waste, miscellaneous chemicals, tanks, surface debris and soil within the perimeter of the 11 acre facility. The Scope of Work included the following specific tasks:

- Site preparation for remedial operations
- On-site well and pipe sealing
- Volatile organic compound air monitoring program
- Drum staging, sampling and analysis
- Bulking of waste
- Drum crushing
- Removal, transportation and disposal of all miscellaneous items and wastes
- Soil removal and disposal to a depth of one foot from approximately 58% of the total surface area of the site and replacement of removed soil with clean soil
- Removal, transportation and disposal of all tanks and their contents
- Treatment and/or disposal of all waste materials
- Final grading of the site
- Decommissioning and removal of all on-site equipment provided and installed by ENRAC during the cleanup

The Scope of Work did not include upgrading, monitoring or operating the existing wastewater treatment system nor did it include stormwater management prior, during or subsequent to the operations performed by ENRAC at the Seymour Recycling site. The Scope did include replacement of spent carbon for the treatment system three times during the project duration. Replacement times were to be determined and requested by U.S. EPA.

Both the Federal (1) and State (2) on-scene coordinators felt the quality of the surface cleanup was excellent. There were some problems, including an improperly designed drum crushing pad, and trucks leaving the site uncovered, which were resolved and are discussed in section 4.4, but in general the cleanup followed the consent decree. Several weeks into the cleanup, and to help resolve these and other problems, the cleanup contractor brought additional management personnel onto the site (2). Operations from that time forward proceeded smoothly. Any variances in the consent decree were reviewed and approved by the circuit court judge. These are noted in section 4.8.

Based on our references, review of reports, and correspondence, the quality of the cleanup effort was good and everyone involved was satisfied.

4.2. Effects of Pre-cleanup Actions

Emergency Actions - In March 1980 EPA undertook interim measures to stabilize the site due to deteriorating conditions and spontaneous combustion of some materials. These emergency actions were implemented with $2 million made available under Section 311 of the Clean Water Act. The actions included: installation of a dike around the site; installation of a carbon unit to treat surface water on-site; sampling and testing of drums, tanks, soil, and water; restaging of approximately 45,000 drums to a more secure area; installation of security fencing; cleanup of a spill of 3,000 gallons of chromic acid; and removal of liquids from bulk storage tanks. IBM and Cummins also removed waste materials from the site during this period.

Remedial Actions - In August 1982, EPA signed a $12,000 Superfund State contract with Indiana for initial remedial measures involving upgrading and repairing of the on-site system for treating surface water.

These emergency and remedial actions, discussed below, technically impacted very little on the final cleanup at Seymour, although they probably reduced the overall surface cleanup costs slightly. IBM and Cummins also spent approximately $1.2 million of their own money to dispose of their waste at Chemical Waste Management's Calumet City facility in early 1980. This amounted to approximately ten percent of the total amount of waste stored at the site and thus also reduced the total cost of the final cleanup (but not in direct proportion since no contaminated soil was removed).

There are conflicting reports regarding the drum restaging efforts which occurred in 1980 by O.H. Materials. The USEPA on-scene coordinator at the time (3) stated the restaging was effective - rows were left between the drums for emergency vehicles to maneuver and to allow for the easy removal of leaking drums. Drums were also allegedly grouped according to acids, cyanides, etc. to minimize their mixing in case of accidental, unnoticed leaks. The cleanup contractor (4) Chemical Waste Management (CWM), however, felt the early remedial actions were ineffective and may have aggravated the situation. He felt the structural integrity of the drums was reduced by the movement - subjecting them to leakage and made their (CWM's) cleanup somewhat more difficult. He also didn't think the drums were segregated according to type of content to any great degree. It must be noted, however, that the emergency clean up contractor, was not CWM, and is a major competitor with them for hazardous waste cleanup activities. The current USEPA OSC, (1) however, felt some type of drum staging was necessary because some drums were half buried in the mud at the site and posed a potential contamination problem.

The ISBH inspector (5), who was on-site for part of the remedial action concurred with CWM's analysis. He also added that the monitoring wells installed by a subcontractor to O.H. Materials, were improperly placed and never functioned as designed. Problems with the wells included lack of covers, ponding on the surface, and faulty installation of Bentonite seals. This subcontractor was also not licensed by the State of Indiana as a well driller.

4.3. Long-Term Effectiveness

The program implemented as part of the Consent Decree was limited to a surface cleanup. The cleanup involved removal of all waste materials from the site and removal of surface soils (to a depth of one foot) from selected areas. These areas were then backfilled and the entire site graded and sloped to the wastewater treatment lagoon. Because of the nature of the cleanup, i.e. limited to removal of surface materials, concerns regarding long term effectiveness are generally not appplicable. Material hauled off-site and disposed of in CWM's facilities becomes their responsibility and liability. The threat to human health and environment posed by the materials previously stored on-site has been eliminated. However, the surface clean-up does not address the potential threat to human health and the environment posed by the possible existence of buried wastes and subsurface contamination.

A fund has been established and other generators who used Seymour have paid in over $5 million to date to assess and remedy the subsurface problems of the site. A Phase I subsurface investigation (6) with a total price of $840,000 has been started and will consist of a number of monitoring wells to assess the degree, movement and type of subsurface pollutants. After this study is completed, a program of containment/abatement or treatment will be adopted. Although the surface cleanup was defined to include one foot of soil, several "hot spots" of soil contamination are known to exist. These are the responsibility now of USEPA and will be addressed as part of the subsurface remedial work.

One long-term aspect of the clean-up that has not yet been addressed concerns the wastewater treatment facility. The treatment system consists of a pond which intercepts site runoff and two large diameter concrete sewer pipes filled with activated charcoal through which the effluent stream flows before discharge to the sanitary sewer system. This facility was originally constructed as part of the early remedial actions and collects and pretreats all surface water on the site prior to discharge to the City of Seymour sewer system. The Consent Decree clearly omits the generators from long-term liability of the treatment facility. Monitoring of the facility presently is the responsibility of the state, which claims it has neither the

personnel nor resources to do the job. The city of Seymour has on occasion sampled the effluent. Samples taken on June 2 and 9, 1983 had phenol readings of 24 and 120 mg/l. These tests were done because the Seymour municipal plant had been upset. (7) Shortly after this sampling was done, the activated carbon in the filters was changed and phenol levels significantly reduced. However, several GC-MS scans of the pretreted wastewater should be taken to identify the pollutants present and to determine the frequency for changing the carbon filters. The cost to treat this wastewater will be absorbed by the city of Seymour unless some type of user charge system is developed. The subsurface agreement worked out by USEPA for Phase II should include long term operation, maintenance and monitoring of this facility as a specific action as well as a fund to pay the city for treatment costs. Upon completion of the Phase II subsurface cleanup, the need for a surface water treatment system should be reassessed. In the meantime, costs of this system should be included in the subsurface cleanup - paid for by the generators signing the consent decree.

4.4 Contractors Qualifications

ENRAC (Environmental Remedial Action) is a division of Chemical Waste Management, Inc., specializing in the field of site mitigation and related cleanup activities. Chemical Waste Management, Inc. is one of three major operating divisions and wholly-owned subsidiaries of Waste Management, Inc. and specializes in the field of collection, processing, treatment and disposal of chemical and chemically related waste materials. Chemical Waste Mangement is perceived as a leading company in the field of hazardous waste management and is the nation's largest transporter and disposer of chemical wastes.

The consultant hired to perform Phase I of the subsurface investigation is CH2M Hill. As one of the largest engineering firms in the United States, they have done many projects in the field of hazardous waste treatment, storage and disposal. Their major subcontractor for Phase I is Environmental Science and Engineering from St. Louis, Missouri. They prepared several reports in the early 1980's at Seymour, are familiar with the project and appear to be qualified to do the work.

A review of the weekly and monthly reports of the Seymour cleanup as well as correspondence shows that CWM had some problems in the beginning but after additional management personnel were added at the site and various meetings held with their employees which emphasized matters of safety and procedures, their performance improved significantly.

The number of personnel employed on the site varied according to the work tasks involved. At least 20 management level employees were on-site for most of the work. Management personnel included:

project manager
project coordinator
on-site administrator
supervisor
foreman
safety representatives
contract administrator
environmental manager
construction engineer
surveyor
technicians
chemists

Specific actions which appeared to cause CWM to add more management people to the project included a truck accident and improper reporting of a hazardous waste spill, hauling material off-site in untarped trucks, improper manifesting of vehicles hauling waste off-site, hauling material to disposed sites not specifically listed in the consent decree, and employees working without proper safety equipment.

4.5. Extent of Actual vs. Estimated Cost

ENRAC, through its parent company Chemical Waste Management, determined a total cost to remove and dispose of drums, tanks, structures and one foot of topsoil from the Seymour site. Their cost of $7.7 million is less than USEPA's estimate of $15.5 million (8) made in 1980. However, the total amount spent for the surface cleanup including emergency and remedial actions approaches $11 million as shown below:

CWM (1983) - final (generator funded)	$7,700,000
IBM (1980) - drum removal (generator funded)	1,200,000
Cummins (1980) - drum removal (generator funded)	180,000
Petrochem (1980) - removal of liquids (EPA funded)	722,000
O.H. Materials (1980) - drum staging (EPA funded)	860,000
Darlage Co. (1980) - surface and drainage (EPA funded)	43,000
O.H. Materials (19800 - acid neutralization (EPA funded)	35,000
Ace Oil (1980) - dike, road and fence (EPA funded)	50,000
TOTAL SURFACE CLEANUP COST	$10,790,000

The E and E estimate (8), 1980, in general proved to be fairly accurate concerning the total number of drums and tanks to be sampled and removed. A significant difference exists, though, in the estimated versus actual amount of contaminated soil to be removed. An analysis and comparison of the actual versus estimated cleanup are given below:

- The E and E estimate assumed that approximately 450,000 gallons of bulk materials would be disposed of by incineration at the Cincinnati MSD facilities, and an additional 50,000 gallons neutralized and disposed of at a facility within 200 miles of Seymour. CWM actually disposed of over 900,000 gallons of bulk material, mostly at its hazardous waste landfill in Emelle, Alabama.

- Hydrogeologic investigations were envisioned to include a magnitometer survey of the area to identify hidden metallic debris, three shallow groundwater wells and one deep well to monitor subsurface conditions. E and E's cost estimate was $27,000 plus monitoring costs of $102,000 initially and $68,000 annually. The CH2M Hill study, (6) a much more thorough investigation, includes the installation of 61 monitoring wells and analysis for a total cost of $680,000 to be conducted over a one year period.

- E and E estimated analysis cost based on sampling 60,000 drums. CWM actually sampled 36,611. Also, by assuming a worst case scenario, E and E estimated 15% (9000) of the drums would require a complete chemical analysis. CWM's actual monthly reports did not indicate any drums which required a complete analysis.

- E and E estimated that 18,000 drums could be bulked and removed (990,000 gallons) to an incinerator in Cincinnati and 6,000 drums neutralized and disposed of in Indianapolis. Only 9,000 drums were estimated to require disposal at Emelle, Alabama and 27,000 drums of sludges were assumed to be disposable at an Indiana State approved landfill. E and E also estimated 20,000 empty drums which could also be disposed of in a state approved landfill. Actually, most wastes from the site were bulked, approximately 903,000 gallons and most drums crushed on-site and disposed of in Emelle, Alabama. No wastes were disposed of in state of Indiana landfills. Public reaction from midwest citizens near the other listed disposal sites eliminated these from consideration. CWM felt the only way to complete the project was to haul the wastes to Emelle.

In summary, total cost for drum sampling and analysis and removal stated in the E and E report was fairly accurate, since their estimate included some drums eventually disposed by IBM and Cummins. However, the E and E report assumed some wastes, including drums of acids, empty drums and bulk stroage tanks, could be disposed of in state approved landfills. This was clearly an oversight and was not a good assumption.

Below is a restimate of the cleanup costs using the E and E assumptions and the actual quantities determined by CWM:

SAMPLING	
$5,000,000 x 36,611 ÷ 60,000 drums	= 3,051,000
DRUM REMOVAL & DISPOSAL	
$3,169,000 X 48,773 ÷ 60,000 drums	= 2,576,000
SOIL REPLACEMENT	
$4,973,000 X 14,272 ÷ 105,000 cu.yds.	= 676,000
	6,302,000
10% CONTINGENCY	630,000
	6,932,000

Allowing for the fact CWM disposed of all wastes in hazardous waste landfills, mostly in Emelle, Alabama, the $7.7MM cost to the group of 24 generators appears reasonable in light of the one foot soil limit. However, the most significant reason why a lower price was achieved is the lesser contaminated soil to be removed (1 foot versus an estimated 5 feet).

* From CWM Monthly Report - November 1983.

4.6. Extent of Health/Environmental Information Available

Air monitoring for volatile organics was done both on and off-site. The collected data did not indicate any elevated concentrations of pollutants off-site. One citizen's complaint was received but after investigation it was determined the source was not from SRC.

Air pollution was a factor on-site, especially when temperatures soared into the 90's. Most of the work occurred under Level B work conditions (respiratory protection) and occassionally under Level C. Cleanup activity schedules were changed as heat and humidity conditions in the summer made work in the afternoon difficult. Workdays began at 6 AM during those months.

Drainage on the site was also a problem. The treatment lagoon was of limited capacity and the excesive rains at different times throughout 1983 overtaxed the facility. However, all water was contained and treated prior to discharge to the sanitary sewer system. USEPA's portable treatment system was brought in on occasion to increase capabilities.

Residents of Snyde Acres, a subdivision of 101 homes located northwest of SRC, were also concerned about groundwater migration affecting their water supplies. All the homes have wells and although actual contamination of the wells was never documented, there was a concern that it could occur. As a result, the Seymour Chamber of Commerce, on behalf of the Snyde Acre landowners, filed a petition in U.S. District Court seeking construction of a water line to serve the residents and requesting payment of the water line extension out of the funds deposited by the second group of generators. A ruling was made on February 27, 1984, ordering the local utility to extend the waterline. The extension would be paid for out of the $5MM collected from the second group of generators. The court ruled that although contamination of the waterwells was not occurring, the direction of the groundwater flow was known and there was an imminent threat or danger to the residents of Snyde Acres. The case was heard by Judge William Steckler (who signed the consent decree) and should have no impact on the subsurface cleanup at SRC.

4.7. Extent that Cleanup Meets Goals and Standards

The original cleanup goals and standards as set forth in the Consent Decree (Appendix B - Scope of Work) are listed below.

- sealing of on-site wells and all underground pipes (except sewer from pretreatment facility)
- sampling and analysis, transport and disposal of all drums and tanks stored at the site
- removal of all soil under drums and tanks to a depth of one foot. Disposal would be in CWM-owned hazardous waste facilities
- replacement of soil and regrading site to a common collection point
- removal of all structures, loose and miscellaneous material and disposal in a CWM hazardous waste site
- decommission and removal of all on-site equipment

Both the USEPA and ISBH have thirty days after notification of completion of work by CWM to review and express their approval or disappproval. The District Court will then issue a final letter to CWM stating the project is complete. According to both the USEPA and State on-scene coordinators, these goals were acheived by CWM (note - CWM has not notified the OSC of completion as of January 6, 1983). Further discussions revealed the following:

1. Only one foot of contaminated soil was removed. In several cases, it was obvious that contamination of the soil occurred to a greater depth, because the soil was discolored. These areas were noted by the OSC but no attempt was made to excavate more than what was required by the decree.

2. No attempt was made either in the consent decree or by the OSC to set a residual level of contamination of the soil above which removal must occur. The one foot depth appears to be an arbitrary limit.

3. The State of Indiana on-scene coordinator felt that additional off-site areas should be examined for surface contamination, since the air pollution equipment used with the incinerator at the site failed miserably. He felt that dispersal of pollutants around and off-site could be significant. OVA (Organic Vapor Analyzer) techniques were employed in a February 1982 study by Ecology and Environment, Inc. which identified soil contamination at several places around the perimeter of the site. However, surface soil and plants in the Snyde Park area were not examined.

The goals and standards set forth in the Consent Decree appeared to have been followed exactly except for agreed to changes as noted in section 4.8.

4.8. Reasons for Changes Occurring from Plan

A review of CWM's monthly operating reports and the OSC's weekly reports showed that only minor changes occurred from the consent decree. The consent decree specified six CWM-owned hazardous waste disposal facilities including four landfills, one deep well disposal facility and an off-shore incineration facility. Each of the sites had received interim RCRA status (Part A) and all had filed the necessary Part B application. CWM did utilize a disposal site (Evergreen Landfill in Ohio) which was not on the list of acceptable sites listed in the consent decree. CWM did this because the amount of crushed drums stored on the site was excessive and they had to take immediate action. They also sought approval from the OSC and informed USEPA in writing of what they were doing. However, the USEPA did not allow CWM to dispose of the wastes in non-specifically designated disposal sites and the consent decree was not modified. CWM also stopped using their Ohio Liquid Disposal site after citizen complaints and negative publicity about disposing of someone elses hazardous waste made them curtail operations. In addition, and for the same reasons, CWM could not use its Consent Decree designated sites in Illinois and Indiana for disposal of wastes from Seymour.

Other changes and their perceived effect on the public health and environment are stated below:

1. USEPA requested that CWM leave the gravel loads in place at the completion of the project since they would be needed in conducting the subsurface sampling. In exchange, CWM removed approximately 3 feet of sediment from the wastewater treatment lagoon. Removal of the sediment (which was disposed of in the hazardous waste landfill) should improve performance of the wastewater treatment lagoon. Additional items contained in the approved modification include allowing CWM to keep one tank on site for wastewater treatment, relieve CWM from the requirement to change the activated carbon in the wastewater treatment system a third time, and allow an extension of time by 20 working days because of bad weather in October and November.

2. CWM balked at removing approximately 18 process vessels not originally inventoried, and felt they did not fall under the consent decree to "remove, transport and dispose of all tanks including their contents currently on site." This point of interpretation was argued and CWM unilaterally removed the tanks. This came up in August 1983 and may have been CWM's attempt to test the consent decree, since language did exist which exempted fixtures from removal. USEPA did not interpret process vessels to mean fixtures.

3. CWM also recieved a modification of the Consent Decree in May to solidify a large volume of semi-solid ignitable sludge.

This sludge was not pumpable and was eventually mixed with other materials to eliminate its ignitability and make it transportable as a solid. CWM sought and recieved a RCRA treatment permit to conduct the on-site treatment, which consisted of adding an absorbent material to the liquid and mixing it until a solidified material was formed. The solidified material then met DOT flammability criteria and could be transported.

4.9. Quality of the Government's Attempts to Interact with Local Residents

Both the USEPA (1) and ISBH (2) on-scene coordinators took part in a public meeting held in November 1982 prior to initiation of the clean up, as well as several other meetings with various local civic organizations. In addition, the USEPA on-scene coordinator met twice a month with a Chamber of Commerce task force to brief them on progress made with the cleanup.

The public meeting, held before cleanup activities started was the only public interaction taken. The meeting was not well attended, and persons present were told what was going to be done. There was no request for input from the public. At the meeting, EPA said that routine reports would be given to the public but none were ever published. No community task force was ever established in Seymour to monitor the project, although the League of Women Voters (9) attempted to help keep the cleanup issue alive and in front of the community.

Part of the problem for the failure of the public meeting (9) was felt to be the lack of technical expertise on the part of the public - they could not grasp exactly what was being done - and therefore could not ask pertinent questions. They also did not have the necessary financial backing to hire technical expertise to discuss and pose significant questions.

The local Chamber of Commerce task force (10) was kept well informed of progress of the cleanup and had a great deal of praise for the work the cleanup contractor did at the site. These task force meetings, however, were closed to the public and their usefulness was limited to a select group of people. The Chamber of Commerce also felt the cleanup contractor went out of its way to hire local people to work at the site (especially since the Seymour area was hard hit by the recession). Many of these persons are still employed with CWM at other cleanup sites.

The Mayor of Seymour (11) felt the government's public participation program was of little value. He cited the lack of disclosure of information related to the quantities and types of wastes removed made the public perceive the site as "something in the dark," and "a fear of the unknown." He did say an observation post was erected and that a representative from EPA or CWM would eventually come over and talk. The mayor was given no monthly progress report. He suggested that future cleanups should require devoting a space in each week's local newspaper listing progress made, i.e. number of drums removed, types of wastes, etc.

4.10. Effectiveness of Interactions Between State and Federal Government

Interactions between the State and USEPA were limited during negotiations of the surface cleanup agreement and appear to be doing the same for the subsurface cleanup agreement. The ISBH received a copy of the surface cleanup agreement after its second or third draft and was able to only make minor technical changes to it.

According to both the federal and state OSC, interactions on-site were effective. The major point of contention appeared to be the drum crushing pad design. The original design did not provide sufficient berming to retain residues and rainwater and prevent their release to the surface of the site. The state OSC prevailed and required CWM to redesign and rebuild the drum crushing pad so that all spillage and rainwater could be contained.

Weekly meetings were also initiated two months after cleanup began to facilitate communications between the regulatory people and the cleanup contractor, as well as the trustee representative and Jackson County health department official.

42-590 O—85——8

4.11. Extent to Which State Agencies Dealt with Long-Term Technical and Economic Responsibilities

The Seymour agreement releases liability to the group of 24 generators for any future cleanup. The material which was removed from the site is CWM's liability in the long term. As previously stated, approximately 5 million dollars has been collected from other generators at the site to undertake the subsurface cleanup in exchange for a release from further liability. USEPA has full responsibility for this future cleanup as well as the long term monitoring of the site.

There are no provisions for long term monitoring of the surface cleanup either in the consent decree (which would hold the generators liable) or for the material removed from the site and disposed of off-site. As discussed in section 4.9, the ISBH on scene coordinator felt that perhaps surface contamination could be more widespread than is generally known because of the faulty operations of the air scrubber on the incinerator. Previous studies only documented surface contamination in perimeter areas to the north of the site.

There are also no provisions to deal with the long term economics of the system. Indeed, the state of Indiana is concerned about the extent of money which will be required for long term monitoring of the Seymour site. There is no trust fund or cleanup program in place at the State level to provide for long term monitoring needs.

The state is also not fully aware of its long term obligations to monitor the site concerning groundwater and wastewater treatment. This may be caused by the limited interactions which took place between the State and USEPA as noted in Section 4.10. However, these obligations may yet be worked out as part of the subsurface cleanup agreement.

4.12. Assessment Impact of NCP Procedures

The surface cleanup agreement worked out for Seymour was finalized before the effective date of the National Contingency Plan (NCP). Many procedures listed in the plan were followed by the USEPA in finalizing the agreement but several items perhaps would have been done differently had the NCP been in effect. These are listed below:

1. 40CFR 300.62 explains the state's role in carrying out a hazardous substance response. This section (d) says that the State must make a firm commitment to provide funding for remedial implementation. Although Indiana established a fund in 1981, only one million dollars in State money has been collected as of late 1983. This would limit the amount and extent of money available for cleanup activities, and in essence leaves Indiana in almost the same position it was in without the fund.

2. 40CFR 300.64 discusses the preliminary assessment, which must be undertaken if a release is reported. With NCP procedures in place, the air pollution problems - sensed since the mid-1970's - would have caused a federal response and early initiation of cleanup actions. Although the State felt such action should have been taken at Seymour early on, they did not have the "clout" to enact action. Current NCP procedures would allow USEPA to step in and intercede at the time of the air pollution problem.

3. 40CFR 300.65 lists immediate removal actions appropriate if certain events take place. If NCP procedures were in place, the facility would have been secured with a fence. The restaging and control (berming) activities would have probably followed, but hopefully in a more effective manner. However, the $1 million ceiling (d) would have quickly been reached. In Seymour's case, the facility probably would have received additional funding beyond $1 million because of its many problems.

4. The Seymour cleanup may have been thwarted by NCP procedures requiring a 50 percent match for the planned removal - 40 CFR 300.67 (b) (4), since the site was owned by the City. Since the surface cleanup was estimated at $15 million, and 50 percent ($7.5 million) would have exceeded the entire sum the state has available.

The major problem of Seymour revolves around whether the generator group of 24 paid their share of the total overall cleanup costs. Because of the lack of good cost estimates up front (The E and E surface cleanup estimate has numerous mis-assumptions), this will not be known until the final cleanup bill is submitted. The reestimate (section 5.5) shows that CWM's $7.7 million proposal is reasonable.

REFERENCES

(Chapter 4)

(1) Personal Communication - Beverly Kush, USEPA

(2) Personal Communication - Jim Knoy, Indiana State Board of Health

(3) Personal Communication - Charles Castle, USEPA

(4) Personal Communication - Mike McKinney, Chemical Waste Management

(5) Interview - James Hunt, Indiana State Board of Health

(6) "Work Plan for Phase I Remedial Investigation - Seymour Recycling Corporation" - CH2M Hill, August 1983.

(7) Personal Communication - Gary Hukill, Seymour WWTP Superintendent

(8) "Clean-Up/Mitigation Cost Estimate for Seymour Recycling Center," - Ecology and Environment, Inc. August 1980

(9) Personal Communication - Judy Smith, League of Women Voters

(10) Personal Communications - John Bottoroff, Seymour Chamber of Commerce

(11) Personal Communication - Bill Bailey, Mayor of Seymour, Indiana

---

UTAH H. HARDY
NEIC

BOX 25227
DENVER CO 80225
303-234-2236

LARRY KYTE
U.S. EPA
ATTORNEY
230 S. DEARBORN ST
CHICAGO IL 60604
312-353-2000

FRANK BYROS
U.S. EPA
ENGINEER
230 S. DEARBORN ST.
CHICAGO IL 60604
312-353-2000

CHARLES CASTLE
U.S. EPA

CHICAGO IL 60604
312-353-2000

JOHN MCFEE
U.S. EPA
ATTORNEY
230 S. DEARBORN ST.
CHICAGO IL 60604
312-353-2094

DENNIS DEVLIN
U.S. EPA
ENGINEER

WASHINGTON DC

PAUL SCHAEFER
U.S. DEPARTMENT OF JUSTICE
ATTORNEY
9TH AND PENNA. AVE. NW
WASHINGTON DC 20530
202-633-1308

CHARLES GOODLOE
U.S. ATTORNEYS OFFICE

46 E. OHIO ST. ROOM 105
INDIANAPOLIS IN
317-269-6333

APPENDIX 1

Interested/knowledgeable Individuals

1. Public Officials
    2. Federal
    3. State
    4. County
    5. Local
6. Private Citizens
7. News Media
8. Public Interest Groups
9. Business Groups
10. Generators and Generator Representatives
11. Contractors and Consultants
12. Other

PETE OLSON
U.S. EPA
ENGINEER
230 S. DEARBORN ST.
CHICAGO IL 60604
312-353-2110

KATE BOUVE
U.S. EPA

WASHINGTON DC 20460
202-382-4828

GREGORY VANDERLAAN
U.S. EPA

230 S. DEARBORN ST.
CHICAGO IL 60604
312-886-6217

JOHN HAMMOCK
U.S. DEPARTMENT OF JUSTICE
ATTORNEY
9TH AND PENNA. AVE. NW
WASHINGTON DC 20530
202-633-2000

JAMES KISSEL
U.S. FISH AND WILDLIFE SERVICE

612-725-4242

JOHN GILBERT
U.S. EPA

CINCINNATI OH 45268
513-684-7537

LT. PAT HOOPES
U.S. COAST GUARD

312-353-2000

LT. DAVE INNIS
U.S. COAST GUARD
ATTORNEY

312-353-2000

KAY HOLUB
U.S. EPA
ATTORNEY
230 S. DEARBORN ST.
CHICAGO IL 60604
312-353-2110

BEVERLY KUSH
U.S. EPA - SHR-13
SEYMOUR SITE COORD
230 S. DEARBORN
CHICAGO IL 60604
312-523-3222

RICHARD BARTLETT
U.S. EPA
DIRECTOR
230 S. DEARBORN ST.
CHICAGO IL 60604
312-353-9777

GEORGE HALLORAN
INDIANA STATE BOARD OF HEALTH
INSPECTOR
1330 W. MICHIGAN ST.
INDIANAPOLIS IN 46206
317-633-0100

JAMES HUNT
INDIANA STATE BOARD OF HEALTH
INSPECTOR
1330 W. MICHIGAN ST.
INDIANAPOLIS IN 46206
317-633-0762

VIRGIL KONOPINISKI
INDIANA STATE BOARD OF HEALTH
INDUSTRIAL HYGIENE
1330 W. MICHIGAN ST.
INDIANAPOLIS IN 46206
317-633-0100

KENNETH KAVANAUGH
INDIANA STATE BOARD OF HEALTH

1330 W. MICHIGAN AVE.
INDIANAPOLIS IN 46206
317-633-0762

MARV EGGLESTON
INDIANA STATE BOARD OF HEALTH
INSPECTOR
1330 W. MICHIGAN ST
INDIANAPOLIS IN 46206
317-633-0100

JAMES REYNOLDS
INDIANA STATE BOARD OF HEALTH
INSPECTOR
1330 W. MICHIGAN ST
INDIANAPOLIS IN 46206
317-633-0100

JACK WATSON
OFFICE OF ATTORNEY GENERAL-INDIANA
ATTORNEY
219 STATE ST.
INDIANAPOLIS IN 46204
317-232-1008

GEORGE MCMASTERS
INDIANA STATE BOARD OF HEALTH
ENGINEER - WATER
1330 W. MICHIGAN ST.
INDIANAPOLIS IN 46206
317:633:0100

AL LAO
INDIANA STATE BOARD OF HEALTH
ENGINEER-WATER
1330 W. MICHIGAN ST.
INDIANAPOLIS IN 46206
317-633-0100

JAMES KNOY
INDIANA STATE BOARD OF HEALTH
INSPECTOR
1330 W. MICHIGAN ST.
INDIANAPOLIS IN 46206
317-633-0208

KAREN EVANS
INDIANA STATE BOARD OF HEALTH
INDUSTRIAL HYGIENE
1330 W. MICHIGAN ST.
INDIANAPOLIS IN 46206
317-633-0816

DONALD SNYDER
INDIANA STATE BOARD OF HEALTH
ENGINEER - WATER
1330 W. MICHIGAN ST.
INDIANAPOLIS IN 46206
317-633-0100

EARL FORD
INDIANA STATE FIRE MARSHALL

302 INDIANA OFFICE BLDG
INDIANAPOLIS IN 46204

CHARLES YEAGER
JACKSON COUNTY
EXTENSION AGENT
RR #6
SEYMOUR IN 47274

JUDGE BROWN

COUNTY JUDGE

BROWNSTOWN IN

ROBERT GATTE

FORMERLY-HEALTH DPT

812-358-3322

JOSPEH BLACK
JACKSON COUNTY HEALTH DEPTARTMENT

812-522-6474

GARY HUKILL
CITY OF SEYMOUR
SUPERINTENDENT
200 N. CHESTNUT ST.
SEYMOUR IN 47274
812-522-5351

JOHN SPRENGER
CITY OF SEYMOUR
MANAGER
1040 A AVE.
SEYMOUR IN 47274

JAMES BULLARD
CITY OF SEYMOUR
CHIEF

SEYMOUR IN 47274
812-522-1234

GLENN NOBLITT
CITY OF SEYMOUR
CHIEF

SEYMOUR IN 47274
812-522-2598

MR. BAILEY
CITY OF SEYMOUR
MAYOR
CITY HALL
SEYMOUR IN 47274

CHARLES GREIN

FARMER

SEYMOUR IN 47274

TONY SCHRINK
SNYDE ACRES SUBDIVISION

SYYMOUR IN 47274

CHARLOTTE SELLERS
BROWNSTOWN BANNER

BROWNSTOWN IN

THOMAS COCHRAN
CHANNEL 13

INDIANAPOLIS IN

MIKE BROWN
SEYMOUR TRIBUNE

SEYMOUR IN 47274

JUDY SMITH
LEAGUE OF WOMEN VOTERS

601 WENDEMERE DR.
SEYMOUR IN 47274
812-522-5063

CATHERINE L. JACKSON
INDIANA MFGRS. ASSN.
DIR. ENV'T. & ENERGY
115 N. PENNSYLVANIA ST.
INDIANAPOLIS IN 46204

JOHN BOTTOROFF
CHAMBER OF COMMERCE

SEYMOUR IN 47274
812-522-3681

JOSE URANGA
CUMMINS ENGINE COMPANY
COUNSEL
BOX 3005
COLUMBUS IN 47201
812-372-7211

RICHARD LAND
CUMMINS ENGINE COMPANY

COLUMBUS IN 47201

JOSEPH PEGANOFF
CUMMINS ENGINE COMPANY

800 E. THIRD ST
SEYMOUR IN 47274
812-522-9366

ROBERT MORRIS
IBM CORPORATION

540 WHITE PLAINS RD
TARRYTOWN NY 10591
914-997-3915

DENNIS BALOG
WESTERN ELECTRIC

812-522-5467

DIANA NEWSON
CUMMINS ENGINE CO

COLUMBUS IN 47201
812-379-8656

ROGER D. HACKMAN
SEYMOUR MANUFACTURING CO.
PLANT SUPD'T.
500 N. BROADWAY
SEYMOUR IN 47274
812-522-2900

DR. JOSPEH CHU
GM TECHNICAL CENTER

WARREN MI 48090
313-575-8602

ROBERT LUDWIG
R.H. LUDWIG & CO. INC.

400 JACKSON PARK DR.
SEYMOUR IN 47274
812-522-6464

SCOTT RICHTER
IBM CORPORATION

TARRYTOWN NY 10591

JOHN RAMAGE
CH2M-HILL

1941 ROLAND CLARKE PLACE
RESTON VA 22091
703-620-8200

JOHN RENKES
CHEMICAL WASTE MANAGEMENT

150 W. 137TH ST.
RIVERDALE IL 60827
312-654-8800

GEORGE VANDERVELDE
O.H. MATERIALS CO.

BOX 1022
FINDLAY OH 45840
419-422-2529

RAY ROCH
CHEMICAL WASTE MANAGEMENT

150 W. 137TH ST.
RIVERDALE IL 60827
312-654-8800

G.A. SANDNESS
BATTELLE-NORTHWEST

RICHLAND WA 99352
509-376-5056

K-V ASSOCIATES

281 MAIN ST.
FALMOUTH MA 02540
617-540-0561

PAUL TURNER
ACE OIL SERVICE

876 OTTER CREEK RD
OREGON OH 43616
419-726-1521

KENT CORDRY
ENVIRONMENTAL SCIENCE & ENGINEERING

11665 LILBURN PARK RD
ST. LOUIS MO 63141
314-567-4600

DAVID MIZELL
ENVIRONMENTAL SCIENCE & ENGINEERING

11665 LILBURN PARK RD.
ST. LOUIS MO 63141
314-567-4600

SCOTT MCCONE
ECOLOGY & ENVIRONMENT

10400 W. HIGGINS BLVD.
ROSEMONT IL 60018
312-635-6560

ROBERTO F. WEISS-MALIK
CANONIE ENVIRONMENTAL SERVICES CORP

1408 TREMONT RD.
CHESTERTON IN 46304
219-926-8651

ALLAN HOHANSON
PEDCO

CHESTER TOWERS
CINCINNATI OH 45246
513-782-4500

MARION D. CASE
PETROCHEM SERVICES INC.

BOX 337
LEMONT IL 60439
312-257-5875

JAMES KIRK
O.H. MATERIALS, INC.

BOX 1022
FINDLAY OH 45840
419-423-3526

WILLIAM VANCE

ATTORNEY
BOX 172
SEYMOUR IN 47274
812-522-9278

THOMAS J. LANTZ

ATTORNEY
209 W. 2ND ST.
SEYMOUR IN 47274

APPENDIX 2

Hazard Ranking System
Scoring Summaries

1. Mitre Model Scoring - Field Investigation Team
   TDD No. HQ-8109-01, Ecology and Environment
   October 23, 1981

2. Hazard Ranking System Scoring - Indiana State
   Board of Health, July 27, 1982

3. Mitre Model Scoring - USEPA (original)

FIELD INVESTIGATIONS OF UNCONTROLLED HAZARDOUS WASTE SITES

FIT PROJECT

TASK REPORT TO THE
ENVIRONMENTAL PROTECTION AGENCY
CONTRACT NO. 68-01-6056

MITRE MODEL SCORING

OF

SEYMOUR RECYCLING

INDIANA

TDD No. EQ-8109-01

Submitted by: Gary P. Clemons, Ph.D.
Submitted to: Steve Caldwell

23 October 1981

ecology and environment, inc.

International Specialists in the Environmental Sciences

HAZARDOUS WASTE SITE RANKING FORM - EPA

Site Name: Seymour Recycling Location: Seymour, Indiana

ROUTE - GROUNDWATER

	Scores		
	Original	FIT	Diff
Measured Level or Evidence of Release	45	45	-
Depth to Aquifer of Concern			
Net Precipitation			
Permeability of Unsaturated Zone			
Containment			
Physical State	3	3	
Persistence	3	3	-
Toxicity/ Infectiousness	3	3	-
Total Waste Quantity	5	5	-
Ground Water Use	3	3	-
Distance to Nearest Well Downgradient	3	3	-
Population Served by Ground Water within 3 Mile Radius	2	5	+3
GROUNDWATER ROUTE SUBTOTAL	41.75	97.2	+3.45

ROUTE - SURFACE WATER

	Scores		
	Original	FIT	Diff
Measured Level or Evidence of Release	45	45	-
Site Slope and Terrain			
1 Year 24 Hour Rainfall			
Distance to Surface Water			
Flood Potential			
Containment			
Surface Water Use	2	2	-
Critical Habitats	0	0	-
Population Served by Surface Water Intake Within 3 Miles Downstream from Site.	0	0	-
SURFACE WATER ROUTE SUBTOTAL	12.96	12.96	-

AGGREGATE SITE RANKING

Original	FIT	Diff
45.97	59.24	112.27

ROUTE - AIR

	Scores		
	Original	FIT	Diff
Evidence of Release	45	—	
Physical State/ Volatility	3		
Reactivity	3		
Incompatibility	3		
Toxicity/ Infectiousness	3		
Distance to Nearest Population	3		
Population Within 1 Mile Radius	2		
Critical Environments	0		
Land Use	3		
AIR ROUTE SUBTOTAL	46.17	0	+4.17

REASONS FOR SCORE DIFFERENCES
(USE OTHER SIDE IF NECESSARY)

GW Pop. Seymour municipal well field located approx 2 miles away

Air - Documentation does not show air borne contaminants leaving the site. Non-movable tanks were used storage areas only.

NAME OF REVIEWER: John Cerackie

Facility name: Seymour Recycling Corporation

Location: Seymour, IN

EPA Region: V

Person(s) in charge of the facility: Beverly Kush, U.S. EPA

Name of Reviewer: Shafer/Knov ISBH Date: 7/27/82

General description of the facility:

(For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of the facility; contamination route of major concern; types of information needed for rating; agency action, etc.)

This 14-acre abandoned waste site is approximately three miles up wind of the City of Seymour (pop. is 15,050). Waste piles, bulk tanks, and 60,000 barrels are present and contaminating the ground water and surface water. The containers are rapidly deteriorating causing concern of a major uncontrolled release of contaminates via "all routes". Vandalism and trespass has occurred.

Scores: S_M = 58.15 S_{gw} = 100.00 S_{sw} = 119.03 S_a = 0)

S_{FE} = 70.83

S_{DC} = 25.00

FIGURE 1
HRS COVER SHEET

Ground Water Route Work Sheet					
Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Observed Release	0 (45)	1	45	45	3.1
If observed release is given a score of 45, proceed to line 4. If observed release is given a score of 0, proceed to line 2.					
2 Route Characteristics					3.2
Depth to Aquifer of Concern	0 1 2 3	2		6	
Net Precipitation	0 1 2 3	1		3	
Permeability of the Unsaturated Zone	0 1 2 3	1		3	
Physical State	0 1 2 3	1		3	
Total Route Characteristics Score				15	
3 Containment	0 1 2 3	1		3	3.3
4 Waste Characteristics					3.4
Toxicity/Persistence	0 3 6 9 12 15 (18)	1	18	18	
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 (8)	1	8	8	
Total Waste Characteristics Score			26	26	
5 Targets					3.5
Ground Water Use	0 1 2 (3)	3	9	9	
Distance to Nearest Well/Population Served	0 4 6 8 10 12 16 18 20 24 30 32 35 (40)	1	40	40	
Total Targets Score			49	49	
6 If line 1 is 45, multiply 1 x 4 x 5 If line 1 is 0, multiply 2 x 3 x 4 x 5			57,330	57,330	
7 Divide line 6 by 57,330 and multiply by 100		S_{gw} = 100			

FIGURE 2
GROUND WATER ROUTE WORK SHEET

10

AGGREGATE SITE RATING

Route	Route Subtotal from 6 or 9	Route Subtotal Squared	Maximum Possible Score
Ground Water	97.2	9447.84	$(97.2)^2 = 9447.84$
Surface Water	12.96	167.962	$(97.2)^2 = 9447.84$
Air			$(97.2)^2 = 9447.84$
Sum		9615.8	28,343.52
Square Root of Sum		98.06	168.36
Overall Score* = $\frac{\text{sum} \times 100}{168.36}$		58.24	100

FIRE AND EXPLOSION

Route Subtotal from 8	Maximum Possible Score
	97.2
Adjusted Score = $\frac{\text{Route Subtotal} \times 100}{97.2}$	

DIRECT CONTACT

Route Subtotal from 8	Maximum Possible Score
	97.2
Adjusted Score = $\frac{\text{Route Subtotal} \times 100}{97.2}$	

*The overall and adjusted scores will be between 0 and 100. The maximum overall score for a site with only one exposure route is 57.7.

DRAFT-SUBJECT TO CHANGE

WORKSHEET FOR HAZARDOUS WASTE SITE RANKING MODEL

FIT QUALITY ASSURANCE TEAM

GENERAL

Site name and location: Seymour Recycling Co.

Date(s) of site scoring:

Primary source(s) of information (e.g., EPA region, state, FIT, etc.):

Factors not scored (assigned 0 for additive and 1 for multiplicative) due to insufficient information:

Comments or qualifications:

DRAFT-SUBJECT TO CHANGE

GROUND WATER PATHWAY

[1] Measured Level or Evidence of Release

Describe substance(s) and nature of release:

~~Rocky Flats~~

Describe method of measurement or observation:

Samples taken from wells on site also storage tanks on site and ponds on site indicate ground water contamination. Information from (Final Report to USEPA analytical DATA) By on H. Materials.

[2] Depth to Aquifer of Concern

Describe/name aquifer of concern:

Why is above aquifer of concern?

Depth and how determined, including sources:

Net Precipitation

Net precipitation and how determined, including source(s):

Permeability of Unsaturated Zone

Soil type(s) in unsaturated zone:

Permeability and how determined, including source(s):

DRAFT-SUBJECT TO CHANGE

3 Containment

Method of waste management (e.g., surface impoundment, landfill, etc) of extreme case:

Describe basis for selecting extreme case:

Describe method(s) of waste or leachate containment for above extreme case:

Cite source(s) of information:

6 Physical State

Physical state of waste and source of information:
Sax 5th edition

Persistence

Most persistent compound subject to transport via ground water:
PCB

Basis for selecting compound, including source(s):
highest rating compound found on site.

Basis for selecting persistence rating score:
Mitre tables

Toxicity/Infectiousness

Toxic materials subject to transport via ground water and Sax or NFPA level for each:

	Tox	Persis.	mitre report
PCB	3	3	
Chlorobenzene	2	2	
Phenol	3	1	
cyclohexane	2	2	
Benzene	3	1	

DRAFT-SUBJECT TO CHANGE

Cite source(s) of information indicating toxics present on site:
Samples taken of pond on site

Infectious materials present on site and source(s) of information:

Basis for selecting CDC classification of infectious materials:

7 Total Waste Quantity

Total waste quantity present, including unit of measurement (e.g., tons, cubic yards drums): at present ≈ 60,000 drums still on site also an undetermined amount of bulk storage

Basis for estimating or computing quantity, including source(s) of information:
memo from OSC to Region 5 Response Team indicating quantities on site

8 Ground Water Use

Use(s) of aquifer of concern and source(s) of information:
Copy of topo map from IDNR locating Residential wells still in use in area.

Distance to Nearest Well Downgradient

Distance to nearest well downgradient:
≈ 2,500 ft

How was downgradient direction(s) established, including source(s) of information: Information from O.H. Materials report to US EPA for site hydrogeologic study

How was distance determined?:
from topo maps with wells located on it from IDNR

Is nearest building known to be using ground water? Source of information: From topo map some wells used as nearest downgradient wells.

DRAFT-SUBJECT TO CHANGE

Is nearest well known to be drawing from aquifer of concern? Source of information: yes well logs

Population Served by Ground Water Within 3-Mile Radius

Population served with 3-mile radius:
City utility as of Sept 1, 1981 4,516 connections
also Savanna Jackson County = 200 connections

How was population counted or computed, including source(s) of information: 4516
÷ 200
4716 × 3.8 = 17,920.

750 × 3.8 = 2850
17920
20,770

Seymour water works manager estimates 700 to 800 people in area on private wells.

Is population known to be served by aquifer of concern? Source of information: municipal wells located ± 2 miles East of site well logs indicate they are in the sand/gravel aquifer over 60 below grade.

Yes, city municipal wells system used 17,920 people.

-4-

DRAFT-SUBJECT TO CHANGE

SURFACE WATER PATHWAY

1 Measured Level or Evidence of Release

Describe substances and nature of release:

Describe method of measurement or observation:
Samples taken of run off in drainage ditches show contamination leaving site to Von Fange Ditch

2 Site Slope and Terrain

Computation of slope and description of points of measurement:

Cite source(s) of information (topo maps, etc.):

1-Year 24-Hour Rainfall

Amount of rainfall and source of information:

Distance to Surface Water

Distance and description of points of measurement:

Cite source(s) of information:

Flood Potential

In what flood plain, if any, is the site located?:

Cite source(s) of information:

42-590 O—85——10

DRAFT-SUBJECT TO CHANGE

[3] Containment

Describe basis for selecting extreme waste management case:

Describe method(s) of waste or leachate containment for extreme case:

Cite source(s) of information:

[8] Surface Water Use

Use(s) of downstream surface water and sources of information:
assumed at least recreational

Critical Habitats

Location and description of downstream critical habitat, if any:
Found Dept. of Fish and Wildlife
no critical habitats in area or endangered sp.

Distance and description of points of measurement:
IDNR stated area in over 500 year floodplain

Cite source(s) of information:

Population Served By Surface Water with Water Intake Within 3 Miles Downstream from Site

Population served by water intake(s): NONE Surface water does not have substantial groundwater

Is surface water within 3 miles in a tidal estuary?: NO

DRAFT-SUBJECT TO CHANGE

Description(s) and location(s) of intake(s) and corresponding population served by each:

How was population counted or computed?:

Cite source(s) of water-intake and population information:

DRAFT-SUBJECT TO CHANGE

AIR PATHWAY

[1] Evidence of Release

Describe contaminant and monitoring which reveal that background levels have been exceeded?:
Documentation does not show air borne contaminants leaving the site. Measurable levels are close by storage areas only.

Cite source(s) of information:
Bob Cibulski - ERT Edison, NJ USEPA
Charles Cuttle - USEPA Region V

[3] Physical State/Volatility

Physical state of waste and source(s) of information:
Benzene Toxic 3 Volt. 3 Ignit. 3
Oils and ~~sludges~~ many volatile mixtures handled
Vapor pressure of waste and source(s) of information:

Reactivity

Reactive substances and source(s) of information:
Picric Acid O. H. Materials Co.
Final Report to USEPA
June 1980

NFPA level for each and basis of selection:

Incompatability

Incompatible substances which are present and source(s) of information:
Acids & cyanides

Basis for selecting incompatibility score:

DRAFT SUBJECT TO CHANGE

5. Distance to Nearest Population

Distance and description of points of measurement:
Less than ½ mile
Residential homes

Cite source(s) of information:
Topo map

Population Within 1-Mile Radius

Population and how counted or computed:
from top 35 homes + airport and sewage plant
31 estimate 50 estimate 5
133 + 50 + 5 = 189

Cite source(s) of information:
Topo map

Land Use

Location and type of determining land use:
Industrial - Airport - ½ mile
agricultural - farming ½ mile

Distance to determining land use:

Cite source(s) of information:
Topo map.

sent to USEPA SF Docket file w/ attached references

Seymour Recycling Corporation

Seymour, Indiana

Seymour Recycling Corporation is an approximately 14 acre site located in Freeman Field Industrial Park, about 2 miles from the center of Seymour, Indiana. The facility is an abandoned industrial waste reclamation operation. Approximately 60,000 drums and 98 bulk storage tanks containing wastes such as solvents, phenols, cyanides, acids, and C-56, were left on site. Hundreds of small containers of hazardous materials primarily from laboratory operations, were also found on site. Some of them, such as ethers, are highly explosive. Studies performed off-site indicated contamination of the soil and groundwater.

Operations began at the site in 1969 when the Seymour Manufacturing Company moved its Chemical Divisions to land it leased at Freeman Field. In June, 1976, the Chemical Division was incorporated into Seymour Recycling Corporation under the ownership of the owners of Seymour Manufacturing Company. In 1978, the site was sold to Environmental Processing Corporation. Because of numerous permit violations, the site was shut down by the State in February, 1980.

EPA undertook emergency actions at the site beginning in March, 1980 using Section 311K of the Clean Water Act. These actions included installation of a dike around the site, installation of a carbon filter unit to treat surface water onsite, sampling and testing of some drums, tanks, soil, and water; restaging of approximately 45,000 drums to more secure areas, installation of security fencing; cleanup of a spill of 3,000 gallons of chromic acid; and removal of liquids from the bulk storage tanks. During this time, 2 waste generators removed wastes from the site.

The first remedial action required at the site is the removal of all wastes. This would be followed by a feasibility Study, including an on-site investigation of buried materials and soil contamination, to determine the most appropriate remedy for addressing contaminated soil and ground water.

APPENDIX E
MODEL WORKSHEETS

Site Name: Seymour Recycling Co.

Location: Seymour Indiana

EPA Region: V

Person(s) in Charge of the Site: C.A. Castle, OSC
Bill Vance, ATTY.

Name of Reviewer: John T. Crowley, Ecology & Environment

Site Overall Score: 58.24

General Description of the Site:

(For example: landfill, surface impoundment, pile, container; types of wastes; location of the site; contamination route of major concern; types of information needed for rating; agency action, etc.)

ROUTE - GROUND WATER

Rating Factor	Basis of Information	Site Rating (Circle One)	Multiplier	Site Score	Maximum Possible Score
1	OBSERVED RELEASE per Gw 9				
Observed Release or Evidence of Release		0 (a)	1	45	45
If the answer is zero, go to step 2 otherwise, go to step 3					
2	ROUTE CHARACTERISTICS[1] per Gw 11				
Depth to Aquifer of Concern		0 1 2 3	2		6
Net Precipitation		0 1 2 3	1		3
Permeability of Unsaturated Zone		0 1 2 3	2		6
			Subtotal		15
3	CONTAINMENT[1,2] per Gw 13				
Containment		0 1 2 3	1		3
4	POTENTIAL FOR RELEASE				
Multiply site score from 2 by site score from 3. The product is site rating for this route.			1		45
5	RELEASE				
Enter site score from 1 or 4.				45	45
6	WASTE CHARACTERISTICS[1,2] per Gw 15				
Physical State		0 1 2 (3)	1	3	3
Toxicity		0 1 2 (3)	2	6	6
Mobility		0 1 2 (3)	2	6	6
			Subtotal	15	15
7	HAZARDOUS WASTE QUANTITY[1] per Gw 17				
Total Waste Quantity		0 1 2 3 4 (5)	1	5	5
(for hazardous substance scoring assign value that is greater score)					
8	TARGETS[1] per Gw 18				
Nearest Water Use		0 1 2 (3)	1	9	9
Population on Aquifer Used (Groundwater)		0 1 2 (3)	3	9	9
Resources Served by Nearest Water Supply		0 1 2 3 4 (5)	1	30	30
			Subtotal	48	48
9	GROUND WATER ROUTE SUBTOTAL				
A. Multiply 5 x 6 x 7 x 8	45 x 15 x 5 x 48 = 162,000				162,000
B. Multiply 9A by normalization[1] factor of 0.6 and Divide by 1,000			0.6	97.2	97.2

[1] Worksheet values multiplied by appropriate factors equal a maximum of 100 for each pathway. A value of 1 assigned to appropriate factor equal a maximum of 100 for that pathway. Assigned values must be the highest possible value for the factor with a Observed Release rating of zero.

[2] Do not rate toxic, flam and reac of each substance e.g., sulfuric chemical plant, acetone, benzene/ethyl, benzene, benzene/ethyl, benzene/ethyl, benzene/ethyl

ROUTE - SURFACE WATER

Rating Factor	Basis of Information	Site Rating (Circle One)	Multiplier	Site Score	Maximum Possible Score
1	OBSERVED RELEASE (see Sec 5)				
Observed release of pollutant at sampling point		0 (1)	1	45	45
If the site water is dam, go to step 3; otherwise, go to step 2					
2	ROUTE CHARACTERISTICS (see Sec 5)				
Site Slope and Terrain		0 1 2 3	1		3
1 Year 24 Hour Rainfall		0 1 2 3	1		3
Distance to Surface Water		0 1 2 3	1		3
Flood Potential		0 1 2 3	2		6
			Subtotal		15
3	CONTAINMENT (see Sec 5)				
Containment		0 1 2 3	1		3
4	POTENTIAL FOR RELEASE				
Multiply two scores from 2 by two scores from 3. The product is the rating for this score.			9		45
5	RELEASE				
Enter the score from 1 or 4				45	45
6	WASTE CHARACTERISTICS (see Sec 6)				
Physical State		0 1 2 (3)	1	3	3
Toxicity/ Mobility/Persistence		0 1 2 (3)	2	6	6
Hazardousness		0 1 2 (3)	2	6	6
			Subtotal	15	15
7	HAZARDOUS WASTE QUANTITY (see Sec 5)				
Total Waste Quantity		0 1 2 3 4 (5)	1	5	5
Use Supplemental Information including waste that is known somewhere					
8	TARGETS (see Sec 6)				
Surface Water Use		0 1 (2) 3	3	6	9
Distance to Fisheries		(0) 1 2 3	9	0	9
Population served per mile on shortest Surface Water Pathway to Human Receptors 2 times Sensitive Environments Factor Score		(0) 1 2 3 4 5	1	0	35
			Subtotal	6	53
9	SURFACE WATER ROUTE SUBTOTAL				
A. Multiply 5 x 6 x 7 x 8	45 x 15 x 5 x 6 = 20,250				181,575
B. Multiply (A.) by normalization factor of 0.64 and divide by 1,000			0.64	12.96	97.2

ROUTE - AIR

Rating Factor	Basis of Information	Site Rating (Circle One)	Multiplier	Site Score	Maximum Possible Score
1	OBSERVED RELEASE (see 4.1)				
Evidence of Release		0 45	1	0	45
If the site score is zero, the route subtotal score is zero, otherwise, go to Step 2					
2	RELEASE				
Enter site score from 1					45
3	WASTE CHARACTERISTICS (1,2 see 4.2)				
Physical State/ Toxicity	Benzene	0 1 2 (3)	1	3	3
Reactivity	Picric Acid	0 1 2 (3)	1	3	3
Incompatibility	Acid/Cyanides	0 1 2 (3)	1	3	3
Toxicity/ Persistence	Benzene	0 1 2 (3)	2	6	6
			Subtotal	15	18
4	HAZARDOUS WASTE QUANTITY (3 see 4.3)				
Total Waste Quantity		0 1 2 3 4 (5)	1	5	5
(In Supplemental determination considering waste that is already contained)					
5	TARGETS (3 see 4.4)				
Distance to Nearest Population		0 1 2 (3)	2	6	6
Population Within 1 Mile Radius		0 1 (2) 3 4 5	5	10	25
Critical Environments		(0) 1 2 3	2	0	6
Land Use		0 1 2 (3)	1	3	3
			Subtotal	19	40
6	AIR ROUTE SUBTOTAL				
A. Multiply 2 x 3 x 4 x 5					135,000
B. Multiply [A] by normalization factor of 0.72 and divide by 1,000			0.72	0	97.2

(1) Only one monitoring area will be summarized as evidence of release.

Air release denied 10-1-81 R Barthelmas - FIT

7

Surface Water Route Work Sheet					
Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Observed Release	0 (45)	1	45	45	4.1
If observed release is given a value of 45, proceed to line 4. If observed release is given a value of 0, proceed to line 2.					
2 Route Characteristics					4.2
Facility Slope and Intervening Terrain	0 1 2 3	1		3	
1-yr. 24-hr. Rainfall	0 1 2 3	1		3	
Distance to Nearest Surface Water	0 1 2 3	2		6	
Physical State	0 1 2 3	1		3	
Total Route Characteristics Score				15	
3 Containment	0 1 2 3	1		3	4.3
4 Waste Characteristics					4.4
Toxicity/Persistence	0 3 6 9 12 15 (18)	1	18	18	
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 (8)	1	8	8	
Total Waste Characteristics Score			26	26	
5 Targets					4.5
Surface Water Use	0 1 (2) 3	3	6	9	
Distance to a Sensitive Environment	(0) 1 2 3	2	0	6	
Population Served/Distance to Water Intake Downstream	(0) 4 6 8 10 / 12 16 18 20 / 24 30 32 36 40	1	0	40	
Total Targets Score			6	55	
6 If line 1 is 45, multiply 1 x 4 x 5. If line 1 is 0, multiply 2 x 3 x 4 x 5			7,020	64,350	
7 Divide line 6 by 64,350 and multiply by 100		S_{sw} = 10.91			

FIGURE 7
SURFACE WATER ROUTE WORK SHEET

Air Route Work Sheet					
Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Observed Release	0 45	1	0	45	5.1
Date and Location:					
Sampling Protocol:					
If line 1 is 0, the S_a = 0. Enter on line 5. If line 1 is 45, then proceed to line 2.					
2 Waste Characteristics					5.2
Reactivity and Incompatibility	0 1 2 3	1		3	
Toxicity	0 1 2 3	3		9	
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8	
	Total Waste Characteristics Score			20	
3 Targets					5.3
Population Within 4-Mile Radius	0 9 12 15 18 21 24 27 30	1		30	
Distance to Sensitive Environment	0 1 2 3	2		6	
Land Use	0 1 2 3	1		3	
	Total Targets Score			39	
4 Multiply 1 x 2 x 3				35,100	
5 Divide line 4 by 35,100 and multiply by 100	S_a = 0				

FIGURE 9
AIR ROUTE WORK SHEET

	S	S^2
Groundwater Route Score (S_{gw})	100.00	10,000.00
Surface Water Route Score (S_{sw})	10.91	119.03
Air Route Score (S_a)	0	0
$S_{gw}^2 + S_{sw}^2 + S_a^2$		10,119.03
$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2}$		100.59
$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2} / 1.73 = S_M =$		58.15

FIGURE 10
WORKSHEET FOR COMPUTING S_M

Fire and Explosion Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Containment	1 (3)	1	3	3	7.1
2 Waste Characteristics					7.2
Direct Evidence	0 (3)	1	3	3	
Ignitability	0 1 2 (3)	1	3	3	
Reactivity	0 1 2 (3)	1	3	3	
Incompatibility	0 1 2 (3)	1	3	3	
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 (8)	1	3	8	
Total Waste Characteristics Score			20	20	
3 Targets					7.3
Distance to Nearest Population	0 1 2 (3) 4 5	1	3	5	
Distance to Nearest Building	0 1 2 (3)	1	3	3	
Distance to Sensitive Environment	(0) 1 2 3	1	0	3	
Land Use	0 1 2 (3)	1	3	3	
Population Within 2-Mile Radius	0 1 2 3 (4) 5	1	4	5	
Buildings Within 2-Mile Radius	0 1 2 3 (4) 5	1	4	5	
Total Targets Score			17	24	
4 Multiply 1 x 2 x 3			1020	1,440	
5 Divide line 4 by 1,440 and multiply by 100		S_{FE} =	70.83		

FIGURE 11
FIRE AND EXPLOSION WORK SHEET

Direct Contact Work Sheet

Rating Factor	Assigned Value (Circle One)	Multiplier	Score	Max. Score	Ref. (Section)
1 Observed Incident	(0) 45	1	0	45	8.1
If line 1 is 45, proceed to line 4 If line 1 is 0, proceed to line 2					
2 Accessibility	0 1 2 (3)	1	3	3	8.2
3 Containment	0 (15)	1	15	15	8.3
4 Waste Characteristics Toxicity	0 1 2 (3)	5	15	15	8.4
5 Targets					8.5
Population Within a 1-Mile Radius	0 1 (2) 3 4 5	4	8	20	
Distance to a Critical Habitat	(0) 1 2 3	4	0	12	
Total Targets Score		8	32		
6 If line 1 is 45, multiply 1 x 4 x 5 If line 1 is 0, multiply 2 x 3 x 4 x 5		5,400	21,600		
7 Divide line 6 by 21,600 and multiply by 100	S_{DC} = 25.00				

FIGURE 12
DIRECT CONTACT WORK SHEET

June 28, 1982

DOCUMENTATION RECORDS
FOR
HAZARD RANKING SYSTEM

INSTRUCTIONS: The purpose of these records is to provide a convenient way to prepare an auditable record of the data and documentation used to apply the Hazard Ranking System to a given facility. As briefly as possible summarize the information you used to assign the score for each factor (e.g., "Waste quantity = 4,230 drums plus 800 cubic yards of sludges"). The source of information should be provided for each entry and should be a bibliographic-type reference that will make the document used for a given data point easier to find. Include the location of the document and consider appending a copy of the relevant page(s) for ease in review.

FACILITY NAME: Seymour Recycling Corporation

LOCATION: Freeman Municipal Airport, Seymour, IN

GROUND WATER ROUTE

1 OBSERVED RELEASE (There are two contaminated aquifers)
One at 10-25', and one at 65-75'
Contaminants detected (5 maximum):
Shallow aquifer-Chloroform, Vinyl Chloride, Benzene, Methyl Bromide, Trichloroethane
Deep aquifer-phenol, phthalates, vinylchloride, chloroform

Rationale for attributing the contaminants to the facility:
This is primarily an agricultural area and SRC is the only facility in the immediate area that could possibly cause this contamination plus result of the report:
'Data from Groundwater Contamination Study' by Environmental Science and Engineering, Inc. for the EPA and U.S. Coast Guard.

* * *

2 ROUTE CHARACTERISTICS

Depth to Aquifer of Concern

Name/description of aquifers(s) of concern:

Depth(s) from the ground surface to the highest seasonal level of the saturated zone [water table(s)] of the aquifer of concern:

Depth from the ground surface to the lowest point of waste disposal/storage:

Net Precipitation

Mean annual or seasonal precipitation (list months for seasonal):

Mean annual lake or seasonal evaporation (list months for seasonal):

Net precipitation (subtract the above figures):

Permeability of Unsaturated Zone

Soil type in unsaturated zone:

Permeability associated with soil type:

Physical State

Physical state of substances at time of disposal (or at present time for generated gases):

* * *

3 CONTAINMENT

Containment

Method(s) of waste or leachate containment evaluated:

Method with highest score:

4 WASTE CHARACTERISTICS

Toxicity and Persistence

Compound(s) evaluated:

PCBs
Hexachlorocyclopentadiene (C-56)
Cresol
Phenols
Epichlorohydrin

Compound with highest score:

Hexachlorocyclopentadiene (C-56)

Hazardous Waste Quantity

Total quantity of hazardous substances at the facility, excluding those with a containment score of 0 (Give a reasonable estimate even if quantity is above maximum):

60,000 drum + 100 bulk tanks

Basis of estimating and/or computing waste quantity:

EPA estimates

* * *

5 TARGETS

Ground Water Use

Use(s) of aquifer(s) of concern within a 3-mile radius of the facility:

Both aquifers - drinking water

Distance to Nearest Well

Location of nearest well drawing from aquifer of concern or occupied building not served by a public water supply:

Shallow aquifer-1,200 ft. WNW of site
Deep aquifer-1,200 ft. NE of site

Distance to above well or building:

1,200 ft. to Golf Course Well (Shallow)
1,200 ft. to City Well (Deep)

Population Served by Ground Water Wells Within a 3-Mile Radius

Identified water-supply well(s) drawing from aquifer(s) of concern within a 3-mile radius and populations served by each:

Shallow-380 (100 homes @ 3.8)
Deep-city well utilized by more than 10,000 people

Computation of land area irrigated by supply well(s) drawing from aquifer(s) of concern within a 3-mile radius, and conversion to population (1.5 people per acre):

Total population served by ground water within a 3-mile radius:

more than 10,000

SURFACE WATER ROUTE

1 OBSERVED RELEASE

Contaminants detected in surface water at the facility or downhill from it (5 maximum):

Cd
Hg
As

Rationale for attributing the contaminants to the facility:

No other source for these chemicals plus this water receives runoff from U.S. Fish and Wildlife 4/17/81 Study

* * *

2 ROUTE CHARACTERISTICS

Facility Slope and Intervening Terrain

Average slope of facility in percent:

Name/description of nearest downslope surface water:

Average slope of terrain between facility and above-cited surface water body in percent:

Is the facility located either totally or partially in surface water?

Is the facility completely surrounded by areas of higher elevation?

1-Year 24-Hour Rainfall in Inches

Distance to Nearest Downslope Surface Water

Physical State of Waste

* * *

3 CONTAINMENT

Containment

Method(s) of waste or leachate containment evaluated:

Method with highest score:

4 WASTE CHARACTERISTICS

Toxicity and Persistence

Compound(s) evaluated

Same as groundwater

Compound with highest score:

Same as groundwater

Hazardous Waste Quantity

Total quantity of hazardous substances at the facility, excluding those with a containment score of 0 (Give a reasonable estimate even if quantity is above maximum):

60,000 drums and 100 bulk tanks

Basis of estimating and/or computing waste quantity:

EPA estimates

* * *

5 TARGETS

Surface Water Use

Use(s) of surface water within 3 miles' downstream of the hazardous substance:

Recreation-fishing, boating, swimming in White River

Is there tidal influence?

No

Distance to a Sensitive Environment

Distance to 5-acre (minimum) coastal wetland, if 2 miles or less:

None

Distance to 5-acre (minimum) fresh-water wetland, if 1 mile or less:

None

Distance to critical habitat of an endangered species or national wildlife refuge, if 1 mile or less:

None

Population Served by Surface Water

Location(s) of water-supply intake(s) within 3 miles (free-flowing bodies) or 1 mile (static water bodies) downstream of the hazardous substance and population served by each intake:

None

Computation of land area irrigated by above-cited intake(s) and conversion to population (1.5 people per acre):

Total population served:

Name/description of nearest of above water bodies:

Distance to above-cited intakes, measured in stream miles.

AIR ROUTE

1 OBSERVED RELEASE

Contaminants detected:

None

Date and location of detection of contaminants

Methods used to detect the contaminants:

Rationale for attributing the contaminants to the site:

* * *

2 WASTE CHARACTERISTICS

Reactivity and Incompatibility

Most reactive compound:

Most incompatible pair of compounds:

Toxicity

Most toxic compound:

Hazardous Waste Quantity

Total quantity of hazardous waste:

Basis of estimating and/or computing waste quantity:

* * *

3 TARGETS

Population Within 4-Mile Radius

Circle radius used, give population, and indicate how determined:

0 to 4 mi 0 to 1 mi 0 to 1/2 mi 0 to 1/4 mi

Distance to a Sensitive Environment

Distance to 5-acre (minimum) coastal wetland, if 2 miles or less:

Distance to 5-acre (minimum) fresh-water wetland, if 1 mile or less:

Distance to critical habitat of an endangered species, if 1 mile or less:

Land Use

Distance to commercial/industrial area, if 1 mile or less:

Distance to national or state park, forest, or wildlife reserve, if 2 miles or less:

Distance to residential area, if 2 miles or less:

Distance to agricultural land in production within past 5 years, if 1 mile or less:

Distance to prime agricultural land in production within past 5 years, if 2 miles or less:

Is a historic or landmark site (National Register or Historic Places and National Natural Landmarks) within the view of the site?

3. MITRE MODEL - ORIGINAL SCORING

APPENDIX E
MODEL WORKSHEETS

Site Name: SEYMOUR RECYCLING CO

Location: SEYMOUR IN.

EPA Region: V

Person(s) in Charge of the Site: C. L. CASTLE OSC
BILL VANCE, ATTY.
(RECEIVER)

Name of Reviewer: C. L. CASTLE

Site Overall Score: 37.98

General Description of the Site:

(For example: landfill, surface impoundment, pile, container; types of wastes; location of the site; contamination route of major concern; types of information needed for rating; agency action; etc.)

ROUTE - GROUND WATER

Rating Factor	Basis of Information	Site Rating (Circle One)	Multiplier	Site Score	Maximum Possible Score
1	OBSERVED RELEASE (Enter in Line 5)				
Observed Release of Hazardous Substance	FLUORIDE LEAKED CONTINUE TO SAMPLE	(0)		45	(0)
If Line 1 is 0, enter 0 in Line 5. Otherwise, go to Line 2					
2	ROUTE CHARACTERISTICS (Enter in Line 6)				
Depth to Aquifer of Concern		0 1 2 (3)	2		6
Net Precipitation		0 1 2 (3)	1		3
Permeability of Unsaturated Zone		0 1 2 (3)	1		3
			Subtotal		12
3	CONTAINMENT (Enter in Line 7)				
Containment		0 1 2 (3)	1		3
4	POTENTIAL FOR RELEASE				
Multiply Site Scores from 2 by Site Scores from 3 (Do not divide by three if one score is 0)					0
5	RELEASE				
Enter Site Score from 1 or 4					0
6	WASTE CHARACTERISTICS (Enter in Line 8)				
Persistence	$(CH_2Cl)_2$	0 1 2 (3)	1	3	3
Toxicity	"	0 1 2 (3)	1	6	6
Quantity	"	0 1 2 (3)	1	6	6
			Subtotal	15	15
7	HAZARDOUS WASTE QUANTITY (Enter in Line 8)				
Total Hazardous Constituent Quantity	60,000 DMS	0 1 2 (3)	1	5	5
8	TARGETS (Enter in Line 9)				
Ground Water Use	Private Supply	0 1 (2) 3	2	0	6
Distance to Nearest Well/Population Served	DY ENV.	0 1 (2) 3	2	0	6
	POP. EVAL	0 (1) 2 3	1	12	12
			Subtotal	12	24
9	GROUND WATER ROUTE SUBTOTAL				
A. Multiply 5 x 6 x 7 x 8				18270	162,000
B. Multiply line 9A by 1 if no Hazardous Waste Factor or by 0.6 if one Circle is by 1,000			0.8	0.72	97.2

(30)

ROUTE - SURFACE WATER

Rating Factor	Basis of Information	Site Rating (Circle One)	Multiplier	Site Score	Maximum Possible Score
1	OBSERVED RELEASE				
		0 (1)	1	45	45
If the site score is zero, go to item 2. Otherwise, go to item 3.					
2	ACUTE CHARACTERISTICS				
		0 1 2 3	1		3
		0 1 2 3	1		3
		0 1 2 3	1		3
		0 1 2 3	2		6
			Subtotal		15
3	CONTAINMENT				
		0 1 2 3	1		3
4	POTENTIAL FOR RELEASE				
If either site score item 2 or site score item 3 was assigned a value of zero, enter zero for this rating.			1		15
5	RELEASE				
Enter site score from 1 or 4				45	45
6	WASTE CHARACTERISTICS				
	CH_2Cl_2	0 1 2 (3)	1	3	3
	"	0 1 2 (3)	2	6	6
	"	0 1 2 (3)	2	6	6
			Subtotal	15	15
7	HAZARDOUS WASTE QUANTITY				
	60 PER DRUM 3	0 1 2 3 (4)	1	5	5
If quantity information not available, enter 1 to obtain subtotal					
8	TARGETS				
	Pt Sound Bay	0 1 (2) 3	2	6	6
		(0) 1 2 3	2		6
		(0) 1 2 3	4		12
			Subtotal	6	24
9	SURFACE WATER ROUTE SUBTOTAL				
A. Multiply 5 x 6 x 7 x 8	45 x 15 x 5 x 6			20250	151875
B. Multiply 1A, 1B, 1C, 1D, 1E, and 1F by 1,000			0.00	12.96	972

ROUTE - AIR

Rating Factor	Basis of Information	Site Rating (Circle One)	Multiplier	Site Score	Maximum Possible Score
1	OBSERVED RELEASE				
Evidence of Release	ANALYTICAL SITE DATA	0 (45)	1	45	45
If the site score is zero, the route summary score is zero. Otherwise go to Step 2					
2	RELEASE				
Enter site score from 1				45	45
3	WASTE CHARACTERISTICS				
Physical State Toxicity	MATERIAL	0 1 2 (3)	1	3	3
Reactivity	PICRIC ACIDS	0 1 2 (3)	1	3	3
Incompatibility	BASIC ACID (N)	0 1 2 (3)	1	3	3
Toxicity Biodegradability	CHCl3	0 1 2 (3)	2	6	6
			Subtotal	15	15
4	HAZARDOUS WASTE QUANTITY				
Total Waste Quantity		0 1 2 3 4 (5)	1	5	5
If Quantity is unknown, enter 5 (assume waste may be present)					
5	TARGETS				
Distance to Nearest Population		0 1 2 (3)	4	6	12
Distance to Nearest Off-Site Building		0 (1) 2 3 4	1	10	8
Land Use		(1) 2 3 4	1		4
Population within 1 Mile		0 1 2 (3)	1	3	3
			Subtotal	19	27
6	AIR ROUTE SUBTOTAL				
A. Multiply 2 x 3 x 4 x 5		45 x 15 x 5 x 19		64125	122 XXX
B. Multiply (A) by the normalization factor 0.0022 and divide by 1 XXX			0.0022	46.17 (if ≥ 45.5, = 46)	82

Carry the resulting score over to the summary of routes and pathways.

52

ROUTE - FIRE AND EXPLOSION

Rating Factor	Basis of Information	Site Rating (Circle One)	Multiplier	Site Score	Maximum Possible Score
1	ROUTE CHARACTERISTICS				
Observed Release		0 (1)	x 1	15	15
2	CONTAINMENT				
Containment		0 (3) 1	x 1	3	3
3	POTENTIAL FOR RELEASE				
Multiply site scores from 1 and 2 to get score for 3. The product is the rating for this route			x	45	45
4	RELEASE				
(From box scored from 3)				45	45
5	WASTE CHARACTERISTICS				
Toxicity	Dioxins	0 1 2 (3)	x 1	3	3
Persistence	Picloram	0 1 2 (3)	x 1	3	3
Hazardous Waste Quantity	Acids, Bases, PCB	0 1 2 (3)	x 1	3	3
			Score	9	9
6	HAZARDOUS WASTE QUANTITY				
Total Waste Quantity		0 1 2 3 4 (5)	x 1	5	5
7	TARGETS				
Distance to Nearest Population		0 1 2 (3) 4 5	x 1	3	5
Distance to Nearest Off-Site Building		0 (1) 2 3	x 1	1	3
Distance to Sensitive Environment		(0) 1 2 3	x 1	0	3
Land Use		0 1 2 (3)	x 1	3	3
Population Within 2 Mile Radius		0 1 2 (3) 4 5	x 1	3	5
Number of Downstream Drinking Water Intakes		0 1 2 (3) 4 5	x 1	3	5
			Score	13	24
8	FIRE AND EXPLOSION ROUTE SUBTOTAL				
A. Multiply 4 x 5 x 6 x 7	45 x 9 x 5 x 13			26325	48,600
B. Multiply [A] by normalization factor of 2.0 and divide by 1,000			2.0	52.65	97.2

*The fire and explosion route can be considered only if either of the migration pathways (leaching media) are applicable. Significant fire and explosion threats to the public and to sensitive environmental receptors (sensitive ecosystems, endangered species, etc.) should be documented in the narrative. Explosive threat presented by gas may be considered as supporting evidence.

42-590 O—85——12

ROUTE - DIRECT CONTACT

Rating Factor	Basis of Information	Site Rating (Circle One)	Multiplier	Site Score	Maximum Poss-ible Score
1	OBSERVED RELEASE				
Evidence of Contact		0 (45)	1	45	45
If the site score is zero go to step 2. Otherwise, go to step 5					
2	ROUTE CHARACTERISTICS				
Accessibility of Waste		0 1 2 3	1		3
3	CONTAINMENT				
Containment		0 1 2 3	1		3
4	POTENTIAL FOR RELEASE				
Multiply site score from 2 by site score from 3. The product is site rating for this route			1		9
5	RELEASE				
Enter site score from 1 or 4				45	45
6	WASTE CHARACTERISTICS				
Toxicity/ Persistence	Cr	0 1 2 (3)	5	15	15
7	TARGETS				
Population Within 1 Mile Radius		0 1 (2) 3 4 5	4	8	20
Groundwater Use		(0) 1 2 3	3	0	9
Land Use		0 1 2 (3)	2	6	6
			Subtotal	14	35
8	DIRECT CONTACT ROUTE SUBTOTAL				
A. Multiply 5 x 8 x 9	45 x 15 x 14			9450	21,600
B. Divide by 1 to normalize to a scale of 0-100			43	42.53	97.7

* Maximum possible score if evidence of contact can be considered as indicator evidence

Route	Route Subtotal from 6 or 9	Route Subtotal Squared	Maximum Possible Score
Ground Water	60.75	3690.6	$(97.2)^2 = 9447.84$
Surface Water	12.96	168.0	$(97.2)^2 = 9447.84$
Air	46.17	2131.7	$(97.2)^2 = 9447.84$
Sum		9040.3	28,343.52
Square Root of Sum		63.9	168.36
Overall Score* = $\frac{\text{sum} \times 100}{168.36}$		37.98	100

FIRE AND EXPLOSION	
Route Subtotal from 8	Maximum Possible Score
52.65	97.2
Adjusted Score = $\frac{\text{Route Subtotal} \times 100}{97.2}$	54.2

DIRECT CONTACT	
Route Subtotal from 8	Maximum Possible Score
42.53	97.2
Adjusted Score = $\frac{\text{Route Subtotal} \times 100}{97.2}$	43.7

*The overall and adjusted scores will be between 0 and 100. The maximum overall score for a site with only one exposure route is 57.7.

HAZARDOUS WASTE CONTAMINATION OF WATER RESOURCES

(Superfund Cleanup Policy and the Seymour Recycling Case)

WEDNESDAY, MARCH 14, 1984

HOUSE OF REPRESENTATIVES,
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,
SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT,
Washington, DC.

The subcommittee met at 9:40, in room 2237 of the Rayburn House Office Building, Hon. Elliott H. Levitas (chairman of the subcommittee) presiding.

Mr. LEVITAS. The subcommittee will please come to order.

This morning we are continuing the hearings that the subcommittee has undertaken in connection with hazardous waste contamination of water resources for examination of the 1980 Superfund law. This phase of our hearings has been focusing on the Seymour Recycling Hazardous Waste Site. We've had a number of days of hearings on this particular example case previously. We are trying to get a better understanding of what the problems are in connection with the Superfund law itself, and we believe the Seymour Recycling situation, perhaps, demonstrates better than any other single example what those problems are. And we will continue to focus on the Seymour site in order to illustrate these problems with the hope of establishing a record on which Congress can take action to remedy any shortcomings.

Yesterday we heard from the Congressional Office of Technology Assessment. They gave us their views on the Seymour site; their having done a study on that particular situation. And today we have the opportunity and the privilege of hearing from various parties who were directly and actively involved in the Seymour site; the litigation, the settlement and the cleanup program itself. And I am satisfied that after we have heard from these witnesses today, we will again have the additional and very important critical information that will provide the subcommittee with a much better understanding of what precisely occurred and why.

We have tried to permit the facts to draw our conclusions and will continue to do so. I am appreciative today of the witnesses who are here and look forward to their testimony. Essentially, for those who are not familiar with the breakdown of today's panelists, in the Seymour site the firms that were involved who are here today, from our perspective, fall into three categories. One, those who par-

ticipated in the settlement; the 24 firms that took part in the original settlement with EPA. The representatives of those who participated in what is known as the pro rata settlement or the pro rata cash-out. And third, those who, for our purposes, we call the defendants who are still engaged in litigation with the Environmental Protection Agency. And I am convinced that each of these points of view shed new light on the subject that we are trying to pursue.

The first panel this morning consists of representatives from IBM, Arthur J. Hedge, Jr., who is a vice president of the real estate and construction division of IBM, and Mr. Allan Topol, who is a distinguished attorney here in Washington with the firm of Covington & Burling and serves as outside counsel for IBM, and played a very key role in looking at the settlement that was entered into. In addition to them, Dr. Joseph P. Chu who is the manager of industrial waste and toxic substances section of General Motors Corp., and he is accompanied by Leonard Charla, an attorney on the legal staff of General Motors. And finally, Mr. Robert Bonczek who is director of safety, health, and environmental affairs of the Du Pont Co. from Wilmington, DE.

There will be the other panels and I will introduce those individuals as we get to them. For the record I will, without objection, make part of the record letters of invitation which were extended to the witnesses today, pursuant to which their appearance is now noted.

Before administering the oath to the witnesses, I would like to inquire whether my colleague, Mr. Molinari, has any opening remarks and comments?

Mr. MOLINARI. No. I have no statement today, Mr. Chairman.

Mr. LEVITAS. All right, then we'll get right into it.

[Witnesses sworn.]

Mr. LEVITAS. I notice there is one individual I did not introduce.

Mr. BONCZEK. This is Mr. Berman with Du Pont's legal department.

Mr. LEVITAS. With Du Pont?

Mr. BONCZEK. Yes.

Mr. LEVITAS. Fine. You are also very welcome, Mr. Berman.

Mr. BERMAN. Thank you.

Mr. LEVITAS. We will proceed in the following fashion. We will first hear from Mr. Hedge of IBM and then Mr. Topol. At that point, we may have some questions to those two gentlemen. Following that, we will hear from Mr. Chu and Mr. Bonczek. At the end, I am sure we will be asking questions to all of the members of the panel. If any of you want to contribute in response to a question that is not directed to you, do not hesitate to indicate and I will recognize you for that purpose.

With that, Mr. Hedge, welcome and we look forward to hearing from you.

The full text of your prepared statements will appear in the record at this point.

[Statements referred to follow:]

IBM STATEMENT

U.S. HOUSE OF REPRESENTATIVES
SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION

MR. ARTHUR J. HEDGE, JR., VICE PRESIDENT
IBM REAL ESTATE AND CONSTRUCTION DIVISION

AND

MR. ALLAN TOPOL, OUTSIDE COUNSEL FOR IBM
COVINGTON AND BURLING, WASHINGTON, D.C.

MARCH 14, 1984

STATEMENT OF THE INTERNATIONAL BUSINESS MACHINES CORPORATION
HOUSE SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION

MARCH 14, 1984

* * *

MR. CHAIRMAN AND MEMBERS OF THE COMMITTEE:

MY NAME IS ART HEDGE, JR., AND I AM VICE-PRESIDENT IN IBM'S REAL ESTATE AND CONSTRUCTION DIVISION WITH PRIMARY RESPONSIBLITY WITHIN IBM FOR OUR ENVIRONMENTAL PROGRAMS.

SEATED NEXT TO ME IS ALLAN TOPOL, OUTSIDE COUNSEL FOR IBM FROM THE LAW FIRM OF COVINGTON AND BURLING, OF WASHINGTON, D.C., WHOM THE COMMITTEE ALSO INVITED TO TESTIFY.

I AM HERE TODAY TO DISCUSS IBM'S INVOLVEMENT WITH THE SEYMOUR WASTE SITE. TO PLACE THIS PARTICULAR MATTER IN PERSPECTIVE, HOWEVER, I WANT FIRST TO RESPOND VERY BRIEFLY TO THE COMMITTEE'S INQUIRY CONCERNING IBM'S CORPORATE ATTITUDE AND POLICY WITH REGARD TO PROTECTION OF THE ENVIRONMENT.

IBM MANAGEMENT MAKES A STRENUOUS EFFORT THROUGHOUT ITS OPERATIONS TO MINIMIZE THE GENERATION OF HAZARDOUS WASTE AND TO

DISPOSE OF ANY SUCH WASTE WE CREATE IN A MANNER WHICH WILL NOT DAMAGE THE ENVIRONMENT.

AS YOU KNOW, MR. CHAIRMAN, IBM IS PART OF THE DYNAMIC, HIGHLY COMPETITIVE, AND RAPIDLY GROWING INFORMATION HANDLING INDUSTRY WHICH INCLUDES DATA PROCESSING AND TELECOMMUNICATIONS. IBM'S BUSINESS IS PRINCIPALLY THE DEVELOPMENT, MANUFACTURE, MARKETING, AND MAINTENANCE OF INFORMATION HANDLING PRODUCTS, SUPPLIES, AND SERVICES USED IN BUSINESS, SCIENCE, GOVERNMENT, EDUCATION AND THE HOME. IN PURSUIT OF OUR BUSINESS, WE INVESTED $13.5 BILLION IN RESEARCH AND DEVELOPMENT, AND $12.5 BILLION IN PLANT AND EQUIPMENT FROM 1973 THROUGH 1982.

AS A PART OF THIS DYNAMIC INDUSTRY, WHICH IN TOTAL GENERATED REVENUES OF $325 BILLION IN 1981 AND IS GROWING AT AN ESTIMATED COMPOUND GROWTH RATE OF NEARLY 15% ANNUALLY, IBM UTILIZES THE LATEST TECHNOLOGIES. WHILE HIGH TECHNOLOGY INDUSTRY SUCH AS OURS IS A RELATIVELY CLEAN INDUSTRY, THESE TECHNOLOGIES INCLUDE THE USE OF CHEMICALS IN VARIOUS MANUFACTURING PROCESSES AND SOME HAZARDOUS WASTE IS GENERATED AS A BY-PRODUCT OF THESE MANUFACTURING PROCESSES.

AS OUR TECHNOLOGY HAS EVOLVED, SO HAVE OUR ENVIRONMENTAL PRACTICES. IBM'S TOP MANAGEMENT HAS ISSUED A CORPORATE POLICY STATEMENT COVERING OUR OBJECTIVES FOR THE ENVIRONMENTAL AREA, AND WE HAVE PUBLISHED SEVERAL CORPORATE FACILITIES PRACTICES WHICH ARE CONTINUALLY UPDATED TO DEAL SPECIFICALLY WITH ENVI-

RONMENTAL MATTERS. THE FOCUS OF THESE DOCUMENTS IS ON THE PREVENTION OF ENVIRONMENTAL DAMAGE, RATHER THAN ON REMEDIAL ACTIVITIES.

OUR POLICIES EMPHASIZE THE IMPORTANCE OF BEING CONTINUOUSLY ON GUARD AGAINST ADVERSELY AFFECTING THE ENVIRONMENT AND SEEKING WAYS TO CONSERVE NATURAL RESOURCES. THEY COMMIT IBM TO:

1. MEET OR EXCEED ALL RELEVANT GOVERNMENTAL REGULATIONS IN ANY LOCATION;

2. ESTABLISH STRINGENT STANDARDS OF ITS OWN WHERE GOVERNMENTAL REGULATIONS DO NOT EXIST;

3. ATTEMPT TO UTILIZE NONPOLLUTING TECHNOLOGIES AND TO MINIMIZE ENERGY CONSUMPTION IN THE DESIGN OF PRODUCTS AND PROCESSES;

4. MINIMIZE DEPENDENCE ON TERMINAL WASTE TREATMENT THROUGH DEVELOPMENT OF TECHNIQUES TO RECOVER AND REUSE VALUABLE MATERIALS FROM THE AIR AND WATER;

5. ASSIST GOVERNMENT AND OTHER INDUSTRIES IN DEVELOPING SOLUTIONS TO ENVIRONMENTAL PROBLEMS WHEN APPROPRIATE OPPORTUNITIES ARE PRESENT AND IBM'S EXPERIENCE AND KNOWLEDGE MAY BE HELPFUL.

SEVERAL YEARS AGO IBM ESTABLISHED SPECIFIC GUIDELINES TO ENSURE THE PROPER MANAGEMENT OF HAZARDOUS WASTE. THEY REQUIRE OUR PLANT MANAGERS TO EXAMINE ALL WASTE STREAMS AND TO DETERMINE THE METHOD OF TREATMENT OR DISPOSAL THAT WILL MINIMIZE ADVERSE ENVIRONMENTAL EFFECTS.

WASTE MANAGEMENT OPTIONS, ADOPTED BY IBM, IN ORDER OF PREFERENCE ARE:

1. RECYCLING, REUSING, RECLAIMING;

2. INCINERATION;

3. DETOXIFICATION;

4. SECURE LANDFILL.

OUR GUIDELINES SPECIFICALLY PROVIDE THAT HAZARDOUS WASTE RECYCLING, TREATMENT, STORAGE AND DISPOSAL NOT DONE ON PREMISES OWNED BY IBM SHOULD BE PERFORMED BY VENDORS APPROVED BY THE ENVIRONMENTAL PROGRAMS DEPARTMENT OF IBM'S REAL ESTATE AND CONSTRUCTION DIVISION. THIS IS A HIGHLY SPECIALIZED GROUP WITH TECHNICAL EXPERTISE IN HAZARDOUS WASTE MANAGEMENT. THE DEPARTMENT OVERSEES THE WASTE MANAGEMENT FUNCTION OF ALL IBM LOCATIONS IN THE UNITED STATES.

THE ENVIRONMENTAL PROGRAMS DEPARTMENT IS RESPONSIBLE FOR MAKING SURE THAT ALL WASTE MANAGEMENT FACILITIES ARE CHECKED PERIODICALLY FOR COMPLIANCE WITH ENVIRONMENTAL STANDARDS. TO DATE, USING THIS PROCESS WE HAVE APPROVED 32 LOCATIONS OPERATED BY 19 COMPANIES.

IN LIGHT OF THIS BRIEF REVIEW OF OUR ENVIRONMENTAL POLICIES AND PRACTICES, LET ME NOW DISCUSS IBM'S INVOLVEMENT AT SEYMOUR.

THE WASTES THAT WE SENT TO SEYMOUR WERE PRIMARILY INKS AND RECYCLABLE CLEANING SOLVENTS FROM OUR COPIER AND TYPEWRITER MANUFACTURING OPERATIONS IN BOULDER, COLORADO; LEXINGTON, KENTUCKY; AND GREENCASTLE, INDIANA.

IBM STARTED SENDING HAZARDOUS WASTE MATERIALS TO SEYMOUR MANUFACTURING COMPANY IN 1972, FIRST FROM LEXINGTON, AND THEN FROM BOULDER AND GREENCASTLE.

THERE WERE SEVERAL REASONS FOR INITIALLY CHOOSING SEYMOUR MANUFACTURING COMPANY.

1. ALTHOUGH IBM COULD HAVE CONTRACTED TO DISPOSE OF THESE WASTES AT AN INDUSTRIAL LANDFILL, WE PREFERRED TO RECYCLE OR INCINERATE THE WASTES, AND SEYMOUR MANUFACTURING COMPANY HAD THESE CAPABILITIES.

2. THE SITE WAS FULLY LICENSED AND PERMITTED BY THE STATE OF INDIANA.

3. SEYMOUR MANUFACTURING COMPANY SEEMED TO BE A FINANCIALLY SECURE, REPUTABLE FIRM, RUN BY KNOWLEDGEABLE PERSONNEL.

4. A TEST SHIPMENT SENT TO SEYMOUR MANUFACTURING COMPANY WAS HANDLED PROPERLY.

THE SEYMOUR MANUFACTURING COMPANY CONTINUED TO PERFORM SATISFACTORILY FROM 1972 TO 1977. THEY SUCCESSFULLY HANDLED THE SHIPMENTS THAT WE FORWARDED TO THEM. HOWEVER, BEGINNING IN 1977, DURING ROUTINE SITE VISITS BY IBM PERSONNEL, WE BEGAN TO OBSERVE PROBLEMS AND BROUGHT THEM TO THE ATTENTION OF THE SITE'S MANAGEMENT WITH THE EXPECTATION THAT THEY WOULD BE CORRECTED.

IBM MONITORED ACTIVITIES AT THE SITE CLOSELY. BY LATE 1977, THE SITUATION WAS WORSENING INSTEAD OF IMPROVING. THE PROBLEMS WE DISCOVERED INCLUDED:

1. ACCUMULATION OF UNTREATED WASTE;

2. MECHANICAL PROBLEMS WITH THE EXISTING INCINERATOR;

3. PROBLEMS GETTING A NEW INCINERATOR PERMITTED AND ON-LINE;

4. ALSO, DURING THIS TIME PERIOD, THE SEYMOUR COMPANY WAS IN THE PROCESS OF CHANGING OWNERSHIP, AND THE OPERATING MANAGER WAS REPLACED.

IN LIGHT OF THESE PROBLEMS, IN MARCH 1978 WE STOPPED ALL SHIPMENTS OF WASTE TO SEYMOUR.

NEVERTHELESS, IBM CONTINUED TO BE VERY CONCERNED ABOUT THE CONDITIONS AT THE SITE AND WE SPENT THE NEXT TWO YEARS WORKING VERY HARD TO GET PERMISSION TO REMOVE IBM'S REMAINING MATERIALS FROM THE SITE.

DURING THIS TWO YEAR PERIOD, MARCH 1978 TO MARCH 1980, PRIOR TO ANY LEGAL INITIATIVES ON THE PART OF THE GOVERNMENT AND ALSO PRIOR TO THE ENACTMENT OF SUPERFUND LEGISLATION, IBM HAD NUMEROUS DISCUSSIONS CONCERNING REMOVAL OF IBM DRUMS. THESE DISCUSSIONS INVOLVED THE SITE MANAGEMENT, THE STATE, THE COURT APPOINTED RECEIVER AFTER THE OWNERS WERE NO LONGER FINANCIALLY RESPONSIBLE FOR THE SITE, AND, FINALLY, THE EPA. DESPITE THESE CONTINUAL EFFORTS ON OUR PART, IBM WAS UNABLE TO OBTAIN PERMISSION TO REMOVE OUR REMAINING MATERIALS.

IN MARCH, 1980, THERE WAS AN EXPLOSION AND A FIRE AT THE SEYMOUR SITE. THIS INCIDENT CLEARLY DEMONSTRATED THE INHERENT DANGER AT THE SITE, AND THE POTENTIAL FOR SERIOUS HARM. FOLLOWING THE FIRE, THE EPA REGION V OFFICE ASSUMED CONTROL OF THE

SITE, AND IBM'S CONTINUING REQUEST TO REMOVE DRUMS LABELED AS IBM MATERIAL WAS FINALLY GRANTED IN LATE MARCH 1980.

IBM SENT ENGINEERING REPRESENTATIVES TO SEYMOUR TO IDENTIFY DRUMS WHICH HAD BEEN SHIPPED TO SEYMOUR BY IBM AND STILL REMAINED AT THE SITE. WE UTILIZED TWO CONTRACTORS WHO REMOVED ALL DRUMS DURING APRIL 1980 THAT IBM REPRESENTATIVES COULD IDENTIFY AS POSSIBLY HAVING COME FROM IBM. THESE MATERIALS ULTIMATELY WERE INCINERATED BY THE ENSCO COMPANY AT ITS PERMITTED FACILITY IN EL DORADO, ARKANSAS.

THIS VOLUNTARY EFFORT ON THE PART OF IBM INVOLVED THE REMOVAL OF APPROXIMATELY 2,500 DRUMS FROM THE SEYMOUR RECYCLING SITE AND COST IBM APPROXIMATELY $1.2 MILLION. AS I STATED EARLIER AND AGAIN WANT TO RE-EMPHASIZE, TO OUR KNOWLEDGE, AFTER THIS APRIL 1980 VOLUNTARY EFFORT THERE WAS NO IDENTIFIABLE IBM WASTE ON THE SITE.

IN MAY, 1980, THE DEPARTMENT OF JUSTICE SUED SEYMOUR RECYCLING CORPORATION AND THE OWNERS AND OPERATORS OF THE SEYMOUR SITE UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT OF 1976.

OUR CONCERN FOR THE SITE DID NOT END WITH THE VOLUNTARY REMOVAL OF OUR DRUMS. IN AUGUST 1980, WHEN A GROUP OF OTHER COMPANIES WHICH HAD SENT WASTE TO SEYMOUR AND WHICH HAD MET PREVIOUSLY, CALLED TO ASK US IF WE WERE INTERESTED IN ATTENDING THE NEXT MEETING, WE INDICATED OUR CONTINUED INTEREST IN THE

SITE.

FOR THE NEXT TWO YEARS, BOTH THE GENERATORS AND THE UNITED STATES ATTORNEY'S OFFICE WORKED ON THE SEYMOUR PROBLEM. IBM SUPPLIED THE UNITED STATES ATTORNEY'S OFFICE WITH OUR INVOICES AND RECORDS CONCERNING SEYMOUR. THE EPA AND GENERATORS SEPARATELY RETAINED CONSULTANTS TO STUDY THE SITE TO DETERMINE THE BEST COURSE OF ACTION REGARDING CLEAN UP. VARIOUS MEETINGS, INFORMATION EXCHANGES AND THE CONSULTANTS' WORK CONTINUED THROUGH 1981 AND EARLY 1982.

BY MID-SUMMER 1982, HOWEVER, THESE EFFORTS TO REACH A CLEAN UP AGREEMENT FAILED AND THE GENERATOR GROUP WAS DISBANDED.

IBM FOUND THE IMPASSE UNACCEPTABLE ESPECIALLY CONSIDERING THE DETERIORATING CONDITION OF MANY OF THE BARRELS REMAINING ON THE SITE. FURTHERMORE, THE UNITED STATES GOVERNMENT INFORMED THE GENERATORS THAT IT WOULD BRING SUIT AGAINST THEM UNDER SUPERFUND, UNLESS THE GENERATORS VOLUNTARILY CLEANED UP THE SITE. SUCH LEGAL ACTION WOULD HAVE CLEARLY NECESSITATED FURTHER DELAYS IN THE ACTUAL CLEAN UP. THEREFORE, IBM BECAME PART OF STILL ANOTHER EFFORT TO FORMULATE A CLEAN UP PLAN FOR SEYMOUR.

WE, AND A FEW OTHER COMPANIES, BEGAN TO EXPLORE POSSIBLE SOLUTIONS WITH THE UNITED STATES GOVERNMENT. AS ALLAN TOPOL WILL EXPLAIN IN FURTHER DETAIL, A PROPOSAL WAS FORMULATED WHEREBY

A GROUP OF GENERATORS, WHO HAD SHIPPED APPROXIMATELY 50% OF THE WASTE, WOULD PARTICIPATE IN A CLEAN UP PLAN.

BETWEEN LATE AUGUST 1982 AND OCTOBER 1982, THE DETAILS OF THIS CLEAN UP PLAN WERE WORKED OUT AMONG A GROUP OF 24 GENERATORS, THE EPA, AND THE JUSTICE DEPARTMENT. AT THE EPA'S INSISTENCE, THE AGREEMENT WAS TO BE IN THE FORM OF A CONSENT DECREE WHICH WOULD REQUIRE COURT APPROVAL.

ULTIMATELY, THE FOLLOWING ACTIONS OCCURRED:

1. THE SIGNED DOCUMENTS WERE SUBMITTED TO THE STATE AND LOCAL GOVERNMENTAL BODIES FOR APPROVALS;

2. AN EXPLANATION OF THE PROPOSED CONSENT DECREE AND CLEAN UP PLAN WAS PUBLISHED IN THE FEDERAL REGISTER TO ALLOW FOR PUBLIC REVIEW;

3. THE DEPARTMENT OF JUSTICE SUBMITTED THE PROPOSED DECREE TO THE UNITED STATES DISTRICT COURT IN INDIANA;

4. FINALLY, AFTER HOLDING TWO DAYS OF PUBLIC HEARINGS ON THE PROPOSED CONSENT DECREE, THE FEDERAL COURT FOUND THE AGREEMENT TO BE "FAIR", "REASONABLE", AND "IN THE PUBLIC INTEREST".

WE HAVE ATTACHED TO OUR STATEMENT A COPY OF THE JUDGE'S MEMO-

RANDUM APPROVING THE CONSENT DECREE.

AT THIS POINT, LET ME AGAIN INTRODUCE ALLAN TOPOL, OUTSIDE COUNSEL TO IBM, WHO WILL PROVIDE THE COMMITTEE WITH MORE DETAILS ON THE NEGOTIATION OF THE AGREEMENT WITH THE GOVERNMENT. FOLLOWING ALLAN'S STATEMENT, I WILL BRIEFLY CONCLUDE IBM'S PRESENTATION.

* * *

* * *

STATEMENT BY MR. TOPOL

LET ME BEGIN WITH THE SITUATION THAT EXISTED IN AUGUST, 1982. AT THAT TIME THERE WERE FOUR OVERRIDING CONDITIONS WITH RESPECT TO THE SEYMOUR SITE.

FIRST THERE WERE APPROXIMATELY 50,000 BARRELS ON THE SITE, MANY OF WHICH WERE RUSTING AND DETERIORATING.

SECOND, THERE APPEARED TO BE VIRTUALLY NO CHANCE OF ANY CLEAN UP ACTIVITY BEING FINANCED BY SUPERFUND MONEY. THIS WAS BECAUSE OF A PROVISION IN THE STATUTE THAT REQUIRES STATE PARTICIPATION IN THE FUNDING BEFORE SUPERFUND MONEY CAN BE SPENT. IN THIS CASE, THE STATE'S SHARE WOULD HAVE TO BE 50% OF THE CLEAN UP COSTS BECAUSE THE SEYMOUR SITE WAS PUBLICLY OWNED, AND WE WERE INFORMED BY REPRESENTATIVES OF THE UNITED STATES GOVERNMENT THAT NO STATE MONEY WAS AVAILABLE.

THIRD, WE WERE INFORMED BY THE UNITED STATES GOVERNMENT THAT IT WAS CONSIDERING SUIT AGAINST IBM AND OTHER GENERATORS UNLESS A SETTLEMENT COULD BE REACHED QUICKLY. WITH MORE THAN 300 GENERATORS INVOLVED, A PROTRACTED AND EXPENSIVE LITIGATION WHICH WOULD DELAY THE CLEAN UP SEEMED ALMOST CERTAIN.

FOURTH, THERE HAD BEEN EXTENSIVE NEGOTIATIONS WITH A LARGE GROUP OF GENERATORS TRYING TO REACH A SETTLEMENT WITH THE GOVERNMENT, BUT THOSE DISCUSSIONS, AS ART HEDGE STATED, WERE AT A TOTAL IMPASSE. THE AMOUNT OF MONEY THAT THIS LARGE GROUP OF GENERATORS HAD PLEDGED TOWARD A CLEAN UP OF THE SITE HAD BEEN REJECTED BY THE UNITED STATES GOVERNMENT AS INSUFFICIENT. IT WAS OBVIOUS THAT THE BASIC CONCEPT, WHEREBY ALL GENERATORS WOULD SHARE THE COST OF THE TOTAL CLEAN UP ON A PRO-RATA BASIS, SIMPLY WASN'T WORKING.

AT THAT POINT IT SEEMED TO IBM THAT THE SENSIBLE WAY TO LOOK AT THIS PROBLEM WAS IN TERMS OF ITS LOGICAL PARTS. IF IT WASN'T POSSIBLE TO SOLVE THE PROBLEM AS A WHOLE, PERHAPS IT COULD BE SPLIT UP INTO PARTS. AS WE SAW IT, THERE WERE TWO PARTS: ONE WAS THE SURFACE CLEAN UP AND THE OTHER WAS THE POTENTIAL SUBSURFACE CLEAN UP.

THE ALTERNATIVE WOULD HAVE BEEN TO DO NOTHING, TAKE NO INITIATIVE, PERMIT THE BARRELS TO REMAIN AT THE SITE, WAIT AND LET THE GOVERNMENT SUE THE GENERATORS. WE BELIEVED THAT IBM HAD A GOOD FACTUAL DEFENSE, NAMELY, THAT THERE WAS NO IBM WASTE REMAINING ON THE SITE BECAUSE IBM HAD, VOLUNTARILY AND AT CONSIDERABLE EXPENSE MORE THAN TWO-YEARS EARLIER, REMOVED ALL THE REMAINING IBM MATERIALS FROM THE SITE.

NOTWITHSTANDING THE AVAILABILITY OF THIS DEFENSE, IT SEEMED TO IBM THAT IT MADE FAR MORE SENSE FROM EVERYBODY'S PERSPECTIVE

TO MOVE IN PROMPTLY AND REMOVE ALL OF THE REMAINING BARRELS FROM THE SITE AS QUICKLY AS POSSIBLE. THIS WAS IN THE PUBLIC INTEREST BECAUSE IT WOULD MINIMIZE POTENTIAL SUBSURFACE PROBLEMS.

IT WAS IN THE GOVERNMENT'S INTEREST BECAUSE IT HAD NO WAY TO EXPEDITIOUSLY CLEAN UP THIS SITE WITHOUT A SETTLEMENT AGREEMENT. A COURT CASE WOULD TAKE YEARS TO REACH A CONCLUSION WITH THE SITE DETERIORATING FURTHER DURING THAT TIME.

IT WAS IN IBM'S INTEREST BECAUSE IT WOULD PERMIT THE COMPANY TO AVOID PROTRACTED LITIGATION. IN ADDITION, WE BELIEVED THAT THE JOB COULD BE DONE FASTER AND FOR LESS COST IF PRIVATE COMPANIES ARRANGED FOR THE WORK. WE RECOGNIZED THAT WE WOULD HAVE TO EXPEND TIME AND EFFORT TO DO THE JOB OURSELVES, BUT WE WANTED TO GET THIS JOB DONE.

WITH THIS OBJECTIVE, IT SEEMED REASONABLE TO IBM TO SEPARATE THE SURFACE PROBLEM FROM THE POSSIBLE SUBSURFACE ISSUE. IT WAS CLEAR WE HAD TO ADDRESS THE SURFACE PROBLEM FIRST BECAUSE, IF THERE WAS A SUBSURFACE PROBLEM, IT COULDN'T BE DEALT WITH UNTIL THE SURFACE WAS CLEANED UP.

SO WITH THESE IDEAS IN MIND AT THE END OF AUGUST 1982, I SENT TO STEPHEN RAMSEY AT THE DEPARTMENT OF JUSTICE THE PROPOSAL THAT ULTIMATELY MATURED INTO THE SEYMOUR CONSENT DECREE. NEGOTIATIONS BEGAN IMMEDIATELY AFTER LABOR DAY WEEKEND.

I AM NOT CERTAIN WHETHER THE IDEA OF A SMALL GROUP OF GENERATORS CLEANING UP THE SURFACE IN RETURN FOR A COMPLETE RELEASE ORIGINATED WITH MR. RAMSEY OR WITH ME. I RECALL THAT IT WAS FIRST RAISED IN A CASUAL DISCUSSION THAT MR. RAMSEY AND I HAD AT THE END OF JUNE OF 1982. THERE WAS A DELAY UNTIL THIS IDEA ADVANCED TO THE NEGOTIATING STAGE BECAUSE IBM AND SEVERAL OTHER LARGE GENERATORS FIRST WANTED TO TRY ONCE AGAIN TO SEE IF THERE WAS ANY POSSIBILITY OF BREAKING THE IMPASSE AND REACHING A SETTLEMENT WITH A LARGE GROUP OF GENERATORS. BY EARLY AUGUST 1982 IT WAS CLEAR THAT SUCH A SETTLEMENT WITH A LARGE GROUP WOULD NOT BE POSSIBLE.

ONE OF THE KEY ELEMENTS OF THE SETTLEMENT NEGOTIATIONS THAT COMMENCED EARLY IN SEPTEMBER WAS THAT THE SETTLING GROUP WOULD BE LIMITED TO COMPANIES, WHICH, IN TOTAL, SENT APPROXIMATELY 50% OF THE VOLUME OF THE WASTE TO THE SEYMOUR SITE. THIS 50% REQUIREMENT WAS SET BY THE REPRESENTATIVES OF THE UNITED STATES GOVERNMENT. WHAT THE GOVERNMENT SAID WAS THAT THERE WERE TWO PROBLEMS TO BE ADDRESSED, WHICH THE GOVERNMENT VIEWED AS MORE OR LESS EQUAL IN COST, NAMELY THE SURFACE AND SUBSURFACE CLEAN UPS. IF THE SETTLING GROUP WANTED TO SOLVE ONLY THE FIRST OF THESE PROBLEMS, THAT GROUP SHOULD LIMIT ITSELF TO COMPANIES WHICH CONTRIBUTED APPROXIMATELY ONE-HALF OF THE WASTE TO THE SITE. THIS WOULD THEN LEAVE THE GOVERNMENT FREE TO PURSUE THE REMAINING GENERATORS TO REMEDY THE OTHER HALF OF THE PROBLEM. HOW THE SETTLING GROUP WAS TO BE MADE UP WAS LEFT TO THOSE COMPANY REPRESENTATIVES WHO WERE TRYING TO

ARRANGE THE SETTLEMENT.

WHAT OCCURRED WAS THAT THOSE OF US TRYING TO ARRANGE A SETTLEMENT ACCEPTED THE GOVERNMENT'S 50% REQUIREMENT. WE THEN STARTED AT THE TOP OF THE GOVERNMENT'S LIST OF GENERATORS BY VOLUME, AND WE CONTACTED COMPANIES INDIVIDUALLY IN AN EFFORT TO PULL TOGETHER ENOUGH OF A GROUP TO DO THE JOB.

WHAT WE WERE ASKING COMPANIES IS WHETHER THEY WERE INTERESTED IN PARTICIPATING IN THE FUNDING OF A SURFACE CLEAN UP, REGARDLESS OF THE ULTIMATE COST, IN RETURN FOR A COMPLETE RELEASE FROM LIABILITY.

WHAT WE BASICALLY DID AMONG COMPANIES WHICH DECIDED TO PARTICIPATE IN THIS GROUP, WITH THE EXCEPTION OF A NUMBER OF SMALL GENERATORS WHICH I WILL DISCUSS IN A MINUTE, WAS TO PRORATE THE COSTS AMONG OURSELVES BASED UPON RELATIVE VOLUMES OF WASTE SENT TO THE SITE. WE USED THE GOVERNMENT'S VOLUME FIGURES, NOT BECAUSE WE THOUGHT THAT THOSE WERE PRECISELY CORRECT, BUT BECAUSE WE WERE SEARCHING FOR A SIMPLE FORMULA. THE IDEA WAS THAT IF ONE COMPANY SENT TWICE AS MUCH WASTE TO THE SITE AS ANOTHER COMPANY, IT SHOULD PAY TWICE THE AMOUNT TOWARD THE CLEAN UP. IN PUTTING TOGETHER THE GROUP THERE WERE SEVERAL SMALLER GENERATORS WHO WANTED TO BE INCLUDED, AND A MINIMUM OF $100,000 EACH WAS SET FOR THEM.

THE SETTLING GROUP NEVER NEGOTIATED DOLLARS WITH THE GOVERN-

MENT. RATHER WHAT WE SAID TO THE GOVERNMENT WAS THAT THERE ARE TWO PROBLEMS HERE. WE'LL TAKE OVER ONE OF THESE PROBLEMS, NAMELY, THE SURFACE CLEAN UP, AND WE'LL DO THE WORK REQUIRED TO SOLVE THAT PROBLEM. WE NEGOTIATED HARD WITH EPA TECHNICAL PEOPLE TO REDUCE TO WRITING THE SCOPE OF WORK TO BE DONE IN THE SURFACE CLEAN UP. ULTIMATELY WE REACHED AN AGREEMENT. THAT SCOPE OF WORK IS CONTAINED IN A DOCUMENT SUBMITTED TO THE COURT.

THE PREMISE WAS THAT THE SETTLING GROUP WOULD HIRE A CONTRACTOR TO DO PRECISELY WHAT IS INCLUDED IN THAT SCOPE OF WORK. AS INDICATED ABOVE, WE WEREN'T NEGOTIATING DOLLARS WITH THE GOVERNMENT. WE WERE NEGOTIATING A CLEAN UP PROJECT. ONCE THE SETTLING GROUP HAD ARRIVED AT A SCOPE OF WORK WITH THE GOVERNMENT AND HAD A COST FIGURE FROM A CONTRACTOR, THEN, BASED ON EPA NUMBERS, WE PROVIDED A COMPUTER WITH OUR VOLUMES OF WASTE SENT TO THE SITE. WE ASKED THE COMPUTER TO PERFORM THE CALCULATIONS, SO THAT WE ENDED UP WITH ENOUGH MONEY. THE SHARES FOR INDIVIDUAL COMPANIES WERE BASED ON THEIR RELATIVE VOLUMES, EXCEPT FOR THE FEW SMALLER GENERATORS WHO WANTED TO PARTICIPATE AT $100,000. AND THAT WAS HOW THE GROUP OF 24 SETTLING COMPANIES WAS FORMED.

THE CHOICE OF CHEMICAL WASTE MANAGEMENT AS THE CONTRACTOR TO DO THIS JOB WAS MADE SOLELY BY THE SETTLING GROUP. IT WAS NOT INFLUENCED AT ALL BY THE GOVERNMENT. IT WAS THE VIEW OF TECHNICAL REPRESENTATIVES OF SETTLING COMPANIES THAT CHEMICAL

WASTE MANAGEMENT COULD DO A GOOD JOB AT A REASONABLE PRICE -- THE INGREDIENTS ONE ALWAYS USES IN SELECTING A CONTRACTOR. MOREOVER, SOME OF THE MEMBERS OF THE SETTLING GROUP HAD PREVIOUS SATISFACTORY EXPERIENCE WITH CHEMICAL WASTE MANAGEMENT.

ONE OF THE THINGS THAT I FIND SURPRISING IS THE SUGGESTION THAT BEING IN THIS GROUP OF 24 WAS A GREAT BENEFIT AND THAT SOME COMPANIES WERE UNFAIRLY EXCLUDED. THIS IS PURELY AN AFTER THE FACT RATIONALIZATION. WHAT ACTUALLY OCCURRED WAS THAT, AS WE FORMED THE SETTLING GROUP, WE TRIED HARD TO PERSUADE COMPANIES TO JOIN, AND IN SOME CASES THEY REFUSED. NO SMALL GENERATOR WILLING TO PAY THE ONE HUNDRED THOUSAND DOLLAR MINIMUM WAS REJECTED. RATHER, THOSE WHO ORGANIZED THE SETTLING GROUP WERE THE ONES WHO HAD THE RESPONSIBILITY NOT JUST OF FORMING THE GROUP, BUT OF UNDERTAKING THE TECHNICAL WORK THAT WAS SPECIFIED IN THAT THICK BOOKLET. WE HAD REPRESENTATIVES OF CHEMICAL WASTE LOOKING AT THE SITE, MAKING THEIR ESTIMATES, DECIDING WHAT WAS TO BE DONE TO MEET THE GOVERNMENT'S REQUIREMENTS. WE HAD TECHNICAL PEOPLE OUT WORKING WITH THEM AND WORKING WITH EPA, BECAUSE THAT WAS OUR PART OF THE JOB. IT WASN'T OUR RESPONSIBILITY TO HAND THE GOVERNMENT CHECKS, BUT RATHER OUR PART OF THE JOB WAS TO GET THE WORK ORGANIZED, TO GET IT AGREED UPON, TO GET IT MANAGED, AND TO GET IT DONE.

WHAT I ALSO FIND SURPRISING IS THE CHARGE THAT THIS AGREEMENT WAS SOMEHOW A "SWEETHEART DEAL." I WISH I COULD CONVEY TO YOU HOW INTENSE AND HARD FOUGHT THESE NEGOTIATIONS WERE DURING

THOSE SEVEN WEEKS IN SEPTEMBER AND OCTOBER OF 1982. IN THE SETTLING GROUP WE FELT WE WERE OPERATING UNDER TIME PRESSURE. WE HAD BEEN INFORMED BY THE GOVERNMENT THAT IT PLANNED TO FILE A LAWSUIT IN MID-OCTOBER IF A SETTLEMENT WASN'T IMMINENT BY THEN. THIS WAS IN NO ONE'S INTEREST, PARTICULARLY THE PUBLIC INTEREST BECAUSE OF THE RESULTING DELAY. WE WANTED TO START THE WORK BEFORE WINTER OR ELSE HARSH WEATHER WOULD PREVENT THE WORK FROM BEGINNING UNTIL SPRING, WHICH WOULD MEAN MORE DETERIORATION OF BARRELS AND GREATER ENVIRONMENTAL HARM. IT WOULD ALSO MEAN THAT BECAUSE OF THE TIME LAPSE WE WOULD LOSE OUR FIXED PRICE OFFER FROM CHEMICAL WASTE TO CLEAN UP THE SURFACE.

EACH PARAGRAPH IN THE SEYMOUR CONSENT DECREE WAS HARD FOUGHT AT LENGTH, NOT ONLY WITH THE GOVERNMENT BUT AMONG OUR GROUP OF 24. FOR EXAMPLE, THE GOVERNMENT WAS CONCERNED THAT OUR CONTRACTOR MIGHT NOT PERFORM SATISFACTORILY. AFTER MUCH ARGUMENT ABOUT CONTINGENT LIABILITIES WE FINALLY UNDERTOOK TO ARRANGE FOR A $15 MILLION COMPLETION BOND. INITIALLY SOME IN OUR GROUP DIDN'T WANT A CONSENT DECREE; THEY WANTED A SIMPLE SETTLEMENT AGREEMENT. THE GOVERNMENT WAS ADAMANT ON THE POINT. EVENTUALLY THE GROUP YIELDED.

ON THE LATTER POINT, WE ARE GLAD THAT THE GOVERNMENT PREVAILED.

THE CONSENT DECREE MECHANISM PERMITTED A FULL AND OPEN PUBLIC HEARING FOR THE SETTLEMENT. IT PERMITTED A UNITED STATES DIS-

TRICT JUDGE TO LISTEN TO ALL WHO WANTED TO BE HEARD. AND FINALLY, IT RESULTED IN A JUDGE'S DETERMINATION THAT THIS SETTLEMENT IS IN THE PUBLIC INTEREST.

WITH THAT, LET ME TURN BACK TO ART HEDGE TO CONCLUDE IBM'S PRESENTATION.

* * *

CONCLUSION BY MR. HEDGE

PROMPTLY AFTER THE JUDGE'S APPROVAL OF THE CONSENT DECREE ON DECEMBER 15, 1982, THE CLEAN UP ACTIVITIES BEGAN AT THE SITE. I AM PLEASED TO STATE THAT ALL THE MATERIALS HAVE BEEN REMOVED FROM THE SITE IN ACCORDANCE WITH THE CONSENT DECREE.

WE BELIEVE IBM HAS ACTED VERY RESPONSIBLY THROUGHOUT THIS PROCESS. WE HAVE BEEN CONCERNED ABOUT THE SEYMOUR SITE SINCE WE FIRST DETECTED PROBLEMS WITH THE SITE IN 1977, AND WE ARE PLEASED TO SEE THE SURFACE CLEAN UP NOW COMPLETED. SINCE THIS CLEAN UP IS ONE OF ONLY A FEW SUCH MAJOR SUCCESSFUL CLEAN UPS INVOLVING MULTIPLE GENERATORS, IBM CONSIDERS ITS INVOLVEMENT WITH OTHER GENERATORS AND THE GOVERNMENT IN REACHING THIS SETTLEMENT TO HAVE BEEN A WORTHWHILE EFFORT.

IN CONCLUSION, I WOULD LIKE TO SUMMARIZE IBM'S POSITION AS FOLLOWS:

WE SEE OUR EFFORTS IN THE SEYMOUR CLEAN UP AS CONSISTENT WITH IBM'S CORPORATE ENVIRONMENTAL POLICY. THE ENVIRONMENT CLEARLY WAS BEING ADVERSELY AFFECTED AT SEYMOUR DUE TO DETERIORATING CONDITIONS AT THE SITE. WITHOUT THIS EFFORT, WHICH WAS IMPLEMENTED AND FINANCED BY PRIVATE INDUSTRY, WITH NO PUBLIC EXPENDITURES, REVIEWED AND AGREED TO BY THE GOVERNMENT AND THE COURT, THE CLEAN UP WOULD NOT NOW BE COMPLETE; PERHAPS NOT EVEN BEGUN. SUCH A SITUATION WOULD NOT HAVE SERVED THE PUBLIC INTEREST.

IN THE FINAL ANALYSIS, IBM IS PLEASED TO HAVE BEEN PART OF THE CLEAN UP EFFORT JUST COMPLETED AT SEYMOUR.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA Plaintiff, v. SEYMOUR RECYCLING CORP., et al., Defendants.	)	Civil Action No. IP 80-457-C

MEMORANDUM

This matter comes before the Court for consideration of a proposed Consent Decree which the United States has lodged with the Court. The proposed Consent Decree provides for a surface cleanup of the approximately 60,000 barrels of toxic chemicals, bulk storage, and contaminated soil at the Seymour Recycling Site in Seymour, Indiana.

The United States filed the original complaint in this action on May 19, 1980, alleging violations of Section 7003 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6973 and Section 311 of the Clean Water Act (CWA), 33 U.S.C. § 1321 against various parties including those who owned and operated the Seymour Recycling Site. Named defendants answered the complaint, and discovery proceeded.

On October 26, 1982, the United States filed with this Court an amended complaint adding additional allegations as to the original defendants under the Comprehensive Environmental Response, Compensation, and Liability Act (known as "CERCLA" or "Superfund"), 42 U.S.C. § 9606 and § 9607, enacted after the filing of the original complaint. In addition, the United States named in the amended complaint 24 new defendants, who are alleged to have "generated and caused to be transported solid and hazardous wastes and hazardous substances to the Seymour Site for handling, storage, treatment, or disposal." Motions to intervene were filed by the State of Indiana and the County of Jackson on October 26, 1982. On the same day the United States, the State of Indiana, the County of Jackson, Indiana, the City of Seymour, Indiana, the Board of Aviation Commissioners of Seymour, Indiana, and the 24 companies who were the new defendants added by the amended complaint filed a proposed Consent Decree with the Court.

This Consent Decree provides a mechanism by which the surface cleanup of the Seymour Recycling Site may promptly occur. The Decree provides that each of the 24 companies shall, within 15 days after the entry of the Decree, pay to the Seymour Site Trust Fund, established at a bank in Indianapolis, the sum for that company which is shown in Exhibit A to the

Decree.[1] The Trustees of the Fund shall use the money in the Trust Fund to pay Chemical Waste Management, a firm specializing in hazardous waste removal, to perform the surface cleanup at the Seymour Site. The precise scope of work to be done by Chemical Waste Management is set forth in detail in Exhibit B to the Consent Decree. The Decree also provides that Chemical Waste Management shall be responsible for the completion of the work regardless of its ultimate actual cost and that Chemical Waste Management shall purchase a performance bond in the amount of $15,000,000, which bond shall further assure completion of the work. The Decree specifies the obligations of Chemical Waste Management to purchase and to maintain in force insurance policies to protect the United States, the State and the public. It is contemplated that this project shall take

---

[1]The 24 companies and the amount which each shall pay is as follows: International Business Machines Corporation -- $2,241,001; General Motors Corporation -- $1,032,961; E.I. du Pont de Nemours & Company, Inc. -- $682,805; General Electric Company -- $665,297; Western Electric Company, Inc. -- $385,172; United Technologies Corporation -- $350,156; Atlantic Richfield Company on behalf of The Anaconda Company, Anaconda Wire & Cable Company, Anaconda Aluminum Company, Anaconda Industries, and Anaconda Magnet Wire -- $245,109; Borg-Warner Chemicals, Inc. -- $245,109; RCA Corporation -- $175,078; Bemis Company Inc. -- $175,078; Ford Motor Company -- $175,078; Whirlpool Corporation -- $140,062; McDonnell Douglas Corporation -- $105,047; Dow Corning Corporation -- $105,047; Pennwalt Corporation -- $100,000; Owens-Illinois, Inc. -- $100,000; The Procter & Gamble Company -- $100,000; General American Transportation Corporation -- $100,000; American Can Company -- $100,000; Olin Corporation -- $100,000; AM General Corporation -- $100,000; Cummins Engine Company Inc. -- $100,000; NCR, Corp. -- $100,000; Waste Resources of Tennessee, Inc. (an affiliate of Chemical Waste Management, Inc.) -- $100,000.

approximately one year to complete. The Decree provides for continuing observation and monitoring of the progress of the work by the United States and the State as well as their approval of the satisfactory completion of the work.

The Decree contains a provision requiring the preservation of documents relating to their business transactions with Seymour Recycling Inc. by the 24 companies. It contains a provision by which the United States, the State and the local governments covenant not to sue, execute judgment or take any civil judicial or administrative action against the 24 companies.

At the time of lodging, the Court set a hearing on the Consent Decree for November 10, 1982. On October 29, 1982, pursuant to its regulations published in 28 CFR 50.7, the United States Department of Justice published notice in the Federal Register, 47 Fed. Reg. 49107, of the lodging of the Consent Decree and invited public comment on it. The public comment period which is normally thirty (30) days was shortened to ten (10) days, pursuant to these regulations, because in the judgment of the Department of Justice there was a need to begin the surface cleanup expeditiously to abate a serious public health hazard because the advent of winter in the Seymour area could adversely affect the ability of the contractor to begin work at the Site.

In response to the Federal Register notice, comments were received from sixteen corporations. No comments were received

from any individual citizens. On November 10, the United States filed with the Court copies of comments which it had received as well as its Response to those comments.

At the November 10 hearing, the United States explained the background to the Decree, and all interested persons, including those who were objecting to the entry of the Decree and were not a party in the action, were provided with an opportunity to participate in the hearing and to present their various positions to the Court. At this hearing, representatives of several objecting companies made statements to the Court. At the conclusion of the hearing the Court indicated, in response to objections that the comment period was too short, that the period for public comment would be extended to November 26, 1982, and that a further hearing would be scheduled by the Court for November 30. Several additional comments were received during this period. These were filed with the Court along with the Response of the United States to the Comments.

At the hearing on November 30, the Court once again permitted all interested persons, including those who were not parties in the action, to participate and to present any objections which they might have to the Decree. Again, several objectors made statements to the Court. There were no requests made for formal intervention, notwithstanding the government's statement that it would not oppose such intervention. Those participating in the hearing on November 30 included, in addition to the United States, representatives of the City of

Seymour and the Seymour Aviation Board, the State of Indiana, the Seymour Chamber of Commerce, the League of Women Voters of Seymour, representatives from companies within the group of 24, and representatives of companies opposing the decree. The United States presented sworn testimony from an official of Chemical Waste Management, from an official of the Environmental Protection Agency of the United States Government, and from two officials from the State of Indiana. An opportunity was provided for cross-examination of these witnesses. Finally, in addition to the materials submitted by the Department of Justice and the information presented at the hearings on November 10 and November 30, a number of comments about the Consent Decree were submitted directly to the Court. The United States filed its Supplemental Response to Comments as it is required to do so by its regulations. See 28 C.F.R. 50.7. After consideration of the comments, the United States continues to advocate the entry of the proposed Decree and gives its consent to the entry of the Decree.

The Court has concluded, based upon a careful review and consideration of all the information presented to it, that the Court should approve the Consent Decree. The surface cleanup authorized by this Decree is a very valuable and important part of the overall cleanup of the Seymour Site, which is in the public interest and particularly in the interest of those citizens affected by the Site. The Court is persuaded that time is of the essence in commencing this cleanup before he

onset of winter. Accordingly, this cleanup should proceed as promptly as possible without any further delay.

In deciding whether to approve a proposed decree, a court must inquire whether the decree is consistent both with the Constitution and with the mandate of Congress. See United States v. Ketchikan Pulp Co., 430 F. Supp. 83, 86 (D. Alaska 1977); United States v. Hooker Chemicals and Plastics Corp., 540 F. Supp. 1067, 1072 (W.D.N.Y. 1982). Second, the court "must assure itself that the terms of the decree are fair and adequate." See United States v. Hooker Chemicals and Plastics Corp., 540 F. Supp. at 1072. Finally, the court must inquire whether the settlement is a reasonable one. See In re Corrugated Container Antitrust Litigation, 659 F.2d 1322, 1325 (5th Cir. 1981), cert. denied, 102 S.Ct. 2283 (1982), cert. denied, 102 S.Ct. 2308 (1982). The underlying purpose of the court in making these inquiries is to determine whether the decree adequately protects the public interest. United States v. Ketchikan Pulp Co., supra, 430 F. Supp. at 86. The court "must eschew any rubber stamp approval in favor of an independent evaluation," United States v. Hooker Chemicals and Plastics Corp., supra, 540 F. Supp. at 1072, but because of the clear public policy favoring settlements the court must not substitute its judgment for that of the parties. See Airline Stewards v. American Airlines, 573 F.2d 960, 963 (7th Cir. cert. denied, 439 U.S. 876 (1978).

(1) Legality. With regard to the factors of legality and constitutionality, no objection has been raised to the entry of the Decree. Those statutes under which the amended complaint has been filed empower the United States to bring enforcement actions. See 42 U.S.C. § 9606, 42 U.S.C. § 6928, 42 U.S.C. § 1321(e). Furthermore, the authority of the United States and the Attorney General to compromise during litigation is well established. See United States v. Hooker Chemicals and Plastics Corp., supra, United States v. Kitchikan Pulp Co., supra. Here the Consent Decree is not violative of any law; indeed, it furthers compliance with the statutes under which the action was brought, most particularly with Superfund. In addition, all of the parties to the Decree have consented to the jurisdiction of the Court for the purposes of this Decree.

(2) Fairness. With respect to the rights and obligations of the parties consenting to the Decree, there is no objection as to fairness. All of these parties have urged its entry. This Court has, however, looked beyond the parties consenting thereto and considered the arguments raised by non-parties, both in comments filed with the Department of Justice and in arguments presented to this Court that the entry of the Decree is unfair to them. However, no objecting party requested an opportunity to intervene in this action to offer any evidence of alleged unfairness nor asked to cross-examine any witness.

No citizen of Seymour has objected to the entry of the Decree. However, the unfairness issue has been raised by

companies who also generated and/or caused to be transported hazardous waste to the Seymour Site, but who are not included within the group of 24 companies who are a party to the Consent Decree. These objecting companies argued to this Court that the 24 companies who are parties to the Consent Decree and who shipped approximately 50% of the waste to the Site will be paying $7.7 million for the surface cleanup, while the remaining more than 300 companies who shipped the other 50% of the waste to the Site are being asked to pay in separate settlement negotiations with the United States, which are unrelated to this Consent Decree, the sum of $15 million for ground water cleanup at the Site. The Court has considered carefully and in detail the arguments being advanced by these objectors. It has decided, however, to reject these arguments on the basis of the evidence presented to the Court and arguments by counsel for the United States and for one of the 24 companies.

These facts show that the United States, mindful of its responsibility to clean up the Seymour Site in an expeditious manner in the public interest, decided to split the task into two separate parts, each of which the United States estimates comprises approximately one-half of the work required to achieve a total cleanup of the Site. The first of these parts is the cleanup of the surface at the Site. The evidence presented demonstrated that this surface cleanup must necessarily proceed before any subsurface or ground water cleanup because only when the barrels have been removed from the Site

will it be possible to clean-up the subsurface. Moreover, the evidence showed that the continued presence of leaking barrels of waste on the surface will exacerbate any groundwater contamination.

The group of 24 companies came to the United States with a proposal by which they would arrange with a contractor to perform the surface cleanup in accordance with specifications agreed to by the companies, the United States and the State, regardless of the cost of that work and regardless of cost overruns. Specifically, the Consent Decree provides a $7.7 million cash fund plus a $15 million completion bond for a total cash fund of $22.5 million to pay for completion of the work described in Exhibit B to the Consent Decree. In addition the United States may look to the contractor's assets to require completion of the work, and the contractor is obligated by the terms of the Decree to complete the surface cleanup set forth in Exhibit B to the Decree regardless of its ultimate cost.

At the same time, the United States has set in motion, through negotiation, a procedure by which each of those companies who sent waste to the Site, but are not parties to the Consent Decree may pay a fixed sum of money, based upon the volume of material which they sent to the Site, and thereby obtain a covenant not to sue by the United States. This is a "cash out" proposal which does not require these parties to arrange for the performance of any work. While in total the

sum being asked from those who are not a party to the Consent Decree is greater than the sum being paid by the 24 who are parties to the Decree, this does not render the government's approach unfair to any parties. Those who are parties to the Consent Decree took upon themselves the obligation to hire the contractor and to develop a work proposal by which the surface cleanup is to be completed without active management (but with monitoring) by the United States and without respect to cost. Those companies who are not parties to the Decree have a number of choices. They may accept the government's offer for a cash settlement in return for a covenant not to sue; they may try to form a group of their own to deal with the ground water cleanup in a manner comparable to that dealt with by the 24 companies with respect to the surface; or they may choose to litigate with the United States in which case they may end up with a smaller payment on a proportional basis than those who are in the group of 24.

One of the factors that the Court found persuasive on this issue of unfairness is that by the time of the November 30 hearing approximately 140 companies of those not part of the group of 24 decided to accept the government's "cash out" offer. Their total sum of payment will be in excess of $3 million. To the Court, the large number of acceptances of the government's "cash out" offer indicates that this offer was not unfair and that the government was dealing fairly with those who were not parties to the Consent Decree.

There is a public interest in encouraging parties to come forward first in an effort to settle enforcement cases. This is consistent with the general policy favoring the compromise of claims.

Finally, with respect to the fairness issue, no evidence, such as sworn testimony (as opposed to written statements or arguments of counsel) was ever presented to the Court on this issue by the objectors. Based upon the record before the Court as a whole, the Court finds that the United States has not dealt unfairly with those companies who are not parties to the Consent Decree.

(3) Reasonableness.

In considering the reasonableness of the consent decree, the Court has considered five factors: 1) the nature and extent of the potential hazards at the site; 2) the availability and likelihood of alternatives to the Consent Decree which would result in cleanup of the surface of the site; 3) the adequacy of the technical proposal of the work which will be undertaken; 4) the extent to which the Consent Decree furthers the goals of the statutes which form the basis for this litigation; 5) the extent to which the Court's approval of the Consent Decree is in the public interest.

At the hearing on the Consent Decree, the United States presented the testimony of Beverly Kush, employed as on-scene

coordinator for the Seymour site by the United States Environmental Protection Agency, James Hunt, Division of Land Pollution Control of the Board of Health of the State of Indiana, David Lamb, Director of the Division of Land Pollution Control of the Board of Health of the State of Indiana and Raymond W. Bock, Director of Sales and project supervisor for Chemical Waste Management, Inc. which will perform the actual cleanup work at the Seymour site. No other evidence was presented by any other party or participant in the hearing. No one chose to cross-examine the government's witnesses.

The unrebutted testimony of Kush, Hunt and Bock established that there are approximately 60,000 barrels of hazardous chemicals, numerous bulk storage tanks and laboratory chemicals present at the Seymour site. Although fenced, the site is relatively unsecure and is susceptible of vandalism or easy entry. The site is located within one-half mile of a residential area which depends on wells for drinking water. The runoff of rainwater from the site flows into a drainage ditch which leads off the site and ultimately connects with the East Fork of the White River. Beverly Kush testified that the flow of underground water in the aquifer beneath the site is away from the site towards the residential drinking water wells and the White River.

Through the testimony of Hunt, Bock and Kush the government established that the drums on the site were in an extremely deteriorated condition. The witnesses estimated that between

35-75% of all drums on site were corroded and rusting and were leaking materials into the ground. Government's exhibits 1-27 (a video-tape and twenty-six slide photographs of the site) graphically depicted the dilapidated condition of the barrels on the site. Through the testimony of Hunt and Bock the government showed that the conditions of the barrels had significantly deteriorated during each of the past two years. Kush and Hunt testified that, in their opinions, the site presented an immediate, substantial endangerment to public health and the environment and that fire, explosion and ground water contamination were possible hazards which the conditions at the site could cause.

In the opinion of Kush, Hunt and Bock it is essential that the surface cleanup of the site begin as expeditiously as possible. Bock testified that delaying the beginning of the project until the on-set of winter would make timely completion substantially more difficult if not impossible. He further testified that if frozen ground conditions occurred before the initial site preparation (such as road grading and construction of barrel crushing facilities) was completed, the cleanup activities would in all likelihood not be able to begin until Spring of 1983. Hunt, Kush and Bock all testified that many of the barrels might not withstand another winter at the site and that the condition of the barrels was continuing to deteriorate and would do so if allowed to remain on site.

The Court is persuaded that clean-up of the surface of the site must start as soon as possible to protect against the potential hazards testified to by Kush, Hunt and Bock. The court is very concerned that delay in clean-up will exacerbate the potential for groundwater contamination from the leakage and spillage of chemicals and other substances onto the surface of the site. The government's evidence showed that chemicals and substances which are spilled on the ground at the site may and are getting into groundwater under the site. The Court believes that a prompt cleanup of the surface coupled with analysis of the potential groundwater contamination is essential to the protection of public health and the environment. Kush and Hunt testified that both the federal and state governments place high priority on the determination of the existence and scope of groundwater contamination and the undertaking of the appropriate remedy for it. Both testified that completion of groundwater studies and implementation of a groundwater remedy cannot take place until the surface cleanup is completed. Accordingly, the Court finds the hazardous conditions at the site require an expeditious cleanup of the surface of the Seymour site.

Through the testimony of David Lamb from the Board of Health of the State of Indiana the government established that the State of Indiana lacks any fund with which to match federal expenditures at the site which could come from the Hazardous Response Trust Fund (of "Superfund"). Matching funds are

required under Section 104(c)(3) of the Statute, 42 U.S.C. 6904(c)(3). Mr. Lamb testified that the earliest time the State could realistically expect to provide as much as $1 million in matching funds would be the summer or fall of 1983. Matching funds in the amount of $3.5 million would, in Mr. Lamb's opinion, be available no sooner than the summer of 1984. Ms. Kush from EPA testified that no Superfund monies were available to undertake the surface clean-up. Thus, it appears to the Court that the expenditure of funds under authority of Superfund is not a viable alternative to the Consent Decree as a method of insuring expeditious cleanup of the surface of the site.

The Court judicially notices, and it is the unrebutted testimony of Kush and Hunt, that prior to the clean-up plan embodied in the Consent Decree, no plan insuring full cleanup of the surface had been forthcoming from any party to the litigation or any other persons, other than a temporary, emergency action by EPA. No objecting party could assure the Court that the surface cleanup could promptly be accomplished through any other mechanism than the Consent Decree. Government counsel represented to the Court that previous negotiations for cleanup had proved unfruitful. The oral and written representations of counsel for both objecting parties and counsel for one of the defendants which are parties to the decree confirm the past failure of negotiations.

No party disputes the technical adequacy of the plan for surface cleanup. The testimony offered by the government from

Kush, Hunt and Bock convinces the Court that the plan submitted to the Court is acceptable to the state and federal agencies charged in the first instance with assuring that the proposal is adequate to protect public health and the environment. The Court has satisfied itself through expert testimony that the plan is adequate to accomplish the surface cleanup of the site consistent with the protection of public health and the environment which are the goals of the Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response Compensation Liability Act and the Clean Water Act.

In addition, the Court has determined that the approach taken here by the United States with respect to hazardous waste cases generally is reasonable from the standpoint of the long-range public interest. It is desirable to settle such cases, without the necessity for litigation.

In considering the reasonableness of the approach taken by the government, the Court has inquired of counsel as to how the group of 24 was developed. The Court is satisfied that the approach taken by the government in negotiating with this group was a reasonable one, having in mind the statutory goals of Superfund. Counsel has represented to the Court the following: As a part of the surface cleanup the 24 companies have created a Trust Fund utilizing a Trust Agreement as their legal mechanism and that IBM, General Motors, Cummins Engine and Merchants National Bank & Trust Company of Indianapolis will be the Trustees. The purpose of this Trust Agreement is to

provide for the creation of the Fund which will make payments to Chemical Waste Management to perform the work described in Exhibit B to the Consent Decree. In this regard, the Trust Fund has an agreement with Chemical Waste Management to perform the work described in Exhibit B. This agreement contains a schedule for payments to Chemical Waste Management, and it establishes rights and responsibilities as between Chemical Waste Management and the Trust Fund. The purpose of both of these agreements is to create a funding mechanism to insure prompt completion of the work. Neither the United States nor the State is a party to either of these two agreements. There is a further agreement being negotiated between the United States and the City of Seymour and the Seymour Aviation Board pertaining to the covenant not to sue being given to those companies who are not a party to this group of 24. Counsel has represented to the Court that the United States has no other agreements with the 24 consenting companies listed in Exhibit A to the Consent Decree concerning the cleanup of the Seymour Site.

Under the standards enunciated above, the Court finds that the government's action in entering into this decree is reasonable and is in the public interest. In reaching this determination, the Court has particularly considered the need to abate the hazardous conditions at the site as expeditiously as possible and the unavailability of any other prompt plan to undertake the cleanup.

In its review of the Consent Decree, as originally filed with the Court, the Court observed that the Decree provided that the 24 companies were required to preserve records and documents relating relating to Seymour Recycling Corporation only for a six month period after the effective date of the Decree. In response to a proposal by the Court, the companies agreed to modify that provision (which is in Paragraph XI of the Decree) to require that the companies will each preserve "pending further Court order" records and documents relating to Seymour Recycling Corporation. By this modification of the Decree, the Court has insured the availability of documents and records should a discovery request be made for them in the ongoing litigation with those who are not a party to the Consent Decree. Of course any party to whom a request for the production of documents is made may assert any claims which he has under the Federal Rules of Civil Procedure.

In summary, for the foregoing reasons, the Court believes that the Consent Decree (as modified in Paragraph XI), is in accordance with the public interest. It satisfies the requirements of legality, fairness and reasonableness. Accordingly, the Court has this date signed and entered the Consent Decree.

Dated this 15th day of December, 1982.

William E. Stiehl

UNITED STATES DISTRICT JUDGE

Statement of

General Motors Corporation

on the

Seymour Recycling Corporation

Good morning. I am Dr. Joseph P. Chu, Assistant Director, Plant Environment, Environmental Activities Staff of General Motors Corporation. My responsibility at GM is the coordination of corporate-wide programs for the control of industrial waste and toxic substances. With me is Mr. Leonard F. Charla, an attorney with the GM Legal Staff.

GM is one of four trustees responsible for managing the $7,723,000 Seymour Site Trust Fund for the total surface cleanup of the Seymour Recycling Corporation site at Seymour, Indiana. I represent GM in carrying out the functions of a trustee. In this capacity, I am glad to report that in January this year all wastes and contaminated soils identified in the Consent Decree for this cleanup action had been removed from this site. Therefore, these potential sources of groundwater contamination have been removed.

GM has always had a corporate-wide policy of compliance with all applicable regulations regarding the disposal of hazardous waste. We use only properly permitted transporters and storage, treatment and disposal facilities. Prior to the mid-1970's, GM's waste management practice had concentrated on pollution source control and resource recovery. For example, we conducted projects on waste oil and junk car recovery and a development in which old tires were used as a fuel for stationary boilers.

Since May 1980, when RCRA hazardous waste regulations were promulgated, GM's practices have reflected the Corporation's continuing concern for compliance with increased hazardous waste regulation, while maintaining and improving where possible our source control and resource recovery programs. For example, the problems associated with the use and reuse of drums containing material and their disposal have been minimized by implementation of a reusable "Magnadrum" program as part of our source control program. A Magnadrum is a refillable 300-gallon container which utilizes a positive displacement disc to assure 99% material removal. Therefore, disposal problems associated with conventional drums and the residues in them are being significantly reduced. I refer you to the Attachment for a more detailed explanation of the Magnadrum program.

Prior to enactment of the Resource Conservation and Recovery Act, General Motors put into effect in 1970 an Environmental Performance Review procedure, by which a Corporate team audits compliance by all plants with existing environmental protection laws and regulations. One element of this program is to verify whether the plant in question has followed GM directions to visit disposal sites annually. Another is to obtain copies of the permits or licenses issued to such businesses. This procedure is still in effect and is designed to ensure that only properly licensed and operated facilities are used by GM plants.

Of course, one of the important aspects of GM's compliance program is to closely monitor changing and new federal and state laws and regulations on hazardous waste management. The definition of hazardous waste may change from time to time and may vary among states. Consequently, our approach is to view waste management as a

corporate-wide responsibility, based on all waste materials, not just those which may be declared "hazardous" at one point in time.

This brings me to the subject of disposal technology development -- technology not involving land disposal. General Motors encourages manufacturing process control in our plants that minimizes waste generation. We also practice waste reuse where practicable. This practice is not only environmentally sound, but also is cost/effective, since energy and/or materials are recovered. Waste oil recovery is an example of this practice. Certain wastes which we cannot recover are disposed of at approved GM facilities or are transported to permitted non-GM facilities for recovery, treatment and disposal, in this sequence of preference.

GM has developed several waste recovery processes. As additional examples, our chromium recovery processes at two locations have been in operation for about ten years. Our hydraulic fluid recovery process for polychlorinated biphenyl, or PCB, removal has been in operation for more than two years. We do not believe landfill should be the only means for waste disposal. In fact, we avoid landfill disposal when possible.

Now I would like to return to the Seymour situation. GM plants used the services of Seymour Recycling Corporation because it was <u>not</u> a landfill but rather a waste recycling and incineration facility. The Seymour location had an air pollution control permit issued by the State of Indiana for its incinerator.

GM's Environmental Activities Staff first became involved in a Seymour remedy on April 10, 1980, when an official with the State of Indiana notified us that two other companies had identified and removed drums from the site. Following this notice, a group of GM division and plant personnel was assembled at the site on April 30, 1980, to search for drums which might contain GM waste. No such drums were identified, and so none was removed.

In August 1980, GM representatives were invited by Cummins Engine Company to attend an August 11 meeting for a discussion of the possibility of industrial participation on the cleanup of the Seymour site. Although this meeting was held, the group could not define the scope of the work needed to clean up the site, nor could it agree on a mechanism to carry out the task.

Beginning in the fall of 1980 and through the winter of 1981, General Motors began to receive letters from the U.S. Attorney's Office in Indianapolis, Indiana. The tenor of each of these letters was that certain General Motors' plants had sent materials to the site. However, it was our conclusion that these materials probably had been incinerated or recycled by the time the letters were received. Indeed, General Motors plants had repurchased certain of the recycled materials from Seymour, during the early and mid-1970's. Again, the purpose of dealing with Seymour, was that it was a supplier of recycling and incineration services -- not a landfill.

In April 1981, Mr. Charla met with a member of the U.S. Attorney's office in Indianapolis and indicated that General Motors was willing to cooperate with the federal government in the Seymour matter as soon as information essential for beginning negotiation was provided by the government.

In August 1981, a group of generators, that is companies, including General Motors, which had generated waste materials and had them transported to the site for processing, began meeting from time to time. A list of all generators was obtained from the U.S. Attorney's Office. Once this list was obtained all the generators on the list were invited to future meetings, although not all responded.

At an April 1982 generators' meeting, one of the company representatives suggested that the generators agree to make financial contributions so that settlement negotiations could begin. The first negotiations were held in Washington in May 1982, with representatives of the generators and the government.

It was at one of these meetings, after negotiations had reached an impasse because of the varied interests among the large number of parties represented, that a small group of generators was formed to accomplish a complete surface cleanup. The parties continued to negotiate through the summer of 1982. On November 10, 1982, in U.S. v Seymour Recycling, et al., in order to ensure that the public interest was being protected adequately, the parties petitioned the U.S. District Court for the

Southern District of Indiana for a consent decree. This was granted late in 1982 after two public hearings.

General Motors' view is that this Consent Decree was the best possible solution from a public health and environmental protection standpoint for at least the following reasons:

(1) Under the Superfund Act the remediation could not have begun in 1982 without the $7.7 million contribution from the 24 settling companies. The reason is that Seymour Recycling was located on a site owned by the City of Seymour and Section 104(c)(3) of the statute requires a minimum of 50% participation by the State of Indiana as to funding. In the absence of Indiana's 50%, even EPA was powerless to clean up this site. The parties were advised repeatedly that no funds would be forthcoming from the State. This made the need for a private remediation even more compelling.

(2) The Consent Decree got the remediation process started before the onset of the winter of 1982-83. Had the process failed to start, the threat to public health and welfare would have continued longer.

(3) The Consent Decree eliminated at the earliest possible time concentrated surface sources which potentially could result in groundwater contamination.

These were the public health and environmental concerns which drove the negotiations to fruition in the fall of 1982, and which had to take place in order to provide maximum protection to the public health and welfare.

Thus, the protection of public interest in preserving groundwater purity was not disregarded, nor was it given secondary consideration. In fact, as pointed out previously, the surface cleanup had to be negotiated in the fall of 1982 in order to eliminate the continued threat to the groundwater as quickly as possible.

Information and data available in 1980, and up until the present, show only a potential of groundwater contamination by the Seymour site. And, since this site has now been cleared of all wastes and visibly contaminated soils, it is my professional judgment that continued groundwater monitoring at the site will most likely show no significant contamination. To the contrary, I believe such monitoring will show that the total surface cleanup project, of which GM is a part, has prevented any significant groundwater pollution which could have occurred had the cleanup been delaved.

I believe that the remedial project supported by the 24 companies was a good project for preventing potential hazards at and below the

site. Moreover, it was accomplished in a timely fashion, because the only other alternative would have been to pursue the matter in court, where delays can be numerous and long. The public record will show that our belief in the appropriateness and timeliness of this remedial project is supported by declarations from officials of EPA, the Justice Department and by the federal courts.

Mr. Charla and I will now answer any questions you might wish to ask.

Thank you.

* * *

Mr. LEVITAS. Please proceed.

TESTIMONY OF ARTHUR J. HEDGE, JR., VICE PRESIDENT, IBM REAL ESTATE AND CONSTRUCTION DIVISION; AND ALLAN TOPOL, OUTSIDE COUNSEL FOR IBM, COVINGTON & BURLING; DR. JOSEPH P. CHU, ASSISTANT DIRECTOR, PLANT ENVIRONMENT, ENVIRONMENTAL ACTIVITIES STAFF OF GENERAL MOTORS CORP., ACCOMPANIED BY LEONARD F. CHARLA, COUNSEL; AND ROBERT R. BONCZEK, DIRECTOR OF SAFETY, HEALTH, AND ENVIRONMENTAL AFFAIRS, E.I. DU PONT DE NEMOURS & CO., ACCOMPANIED BY EUGENE BERMAN, COUNSEL

Mr. HEDGE. Mr. Chairman and members of the committee. My name is Art Hedge, Jr., and I am vice president of IBM's Real Estate and Construction Division with primary responsibility within IBM for our environmental programs.

Seated next to me on my left is Allan Topol, outside counsel for IBM in the law firm of Covington & Burling of Washington, DC, whom the committee also invited to testify.

We are here today to discuss IBM's involvement with the Seymour waste site. To place this particular matter in perspective, however, I want to first respond very briefly to the committee's inquiry concerning IBM's corporate attitude and policy with regard to protection of the environment.

IBM management makes a strenuous effort throughout its operations to minimize the generation of hazardous waste and to dispose of any such waste we create in a manner which will not damage the environment.

As you know, Mr. Chairman, IBM is part of the dynamic, highly competitive, and rapidly growing information handling industry which includes data processing and telecommunications. IBM's business is principally the development, manufacture, marketing, and maintenance of information handling products, supplies, and services used in business, science, government, education and the home.

IBM utililizes the latest technologies. And while high technology industry such as ours is a relatively clean industry, these technologies include the use of chemicals in various manufacturing processes and some hazardous waste is generated as a byproduct of these manufacturing processes.

As our technology has evolved, so have our environmental practices. IBM's top management has issued a corporate policy statement covering our objectives for the environmental area, and we have published several corporate facilities practices which are continually updated to deal specifically with environmental matters. The focus of these documents is on the prevention of environmental damage, rather than on remedial activities.

Our policies emphasize the importance of being continuously on guard against adversely affecting the environment and seeking ways to conserve natural resources. They commit IBM to: No. 1, meet or exceed all relevant governmental regulations in any location. No. 2, establish stringent standards of its own where governmental regulations do not exist. No. 3, attempt to utilize nonpolluting technologies and to minimize energy consumption in the design

of products and processes. No. 4, mimimize dependence on terminal waste treatment through development of techniques to recover and reuse valuable materials from the air and water. No. 5, assist government and other industries in developing solutions to environmental problems when appropriate opportunities are present and IBM's experience and knowledge may be helpful.

Several years ago IBM established specific guidelines to ensure the proper management of hazardous waste. They require our plant managers to examine all waste streams and to determine the method of treatment or disposal that will minimize adverse environmental effects.

Waste management options, adopted by IBM, in order of preference are: No. 1, recycling, reusing, reclaiming; No. 2, incineration; No. 3, detoxification; No. 4, secure landfill.

Our guidelines specifically provide that hazardous waste recycling, treatment, storage and disposal not done on premises owned by IBM, should be performed by vendors approved by the environmental programs department of IBM's real estate and construction division. This is a highly specialized group with technical expertise in hazardous waste management. The department oversees the waste management function of all IBM locations in the United States.

Also, the environmental programs department is responsible for making sure that all waste management facilities are checked periodically for compliance with environmental standards. To date, using this process we have approved 32 locations operated by 19 companies.

In light of this brief review of our environmental policies and practices, let me now discuss IBM's involvement at Seymour.

The wastes that we sent to Seymour were primarily inks and recyclable cleaning solvents from our copier and typewriter manufacturing operations in Boulder, CO; Lexington, KY; and Greencastle, IN. IBM started sending hazardous waste materials to Seymour Manufacturing Co. in 1972, first from Lexington, and then from Boulder and Greencastle.

There were several reasons for initially choosing Seymour Manufacturing Co. One, although IBM could have contracted to dispose of these wastes at an industrial landfill, we preferred to recycle or incinerate the wastes, and Seymour Manufacturing Co. had these capabilities. Two, the site was fully licensed and permitted by the State of Indiana. No. 3, the Seymour Manufacturing Co. seemed to be a financially secure, reputable firm, run by knowledgeable personnel.

Mr. LEVITAS. Excuse me, Mr. Hedge.

Mr. HEDGE. Yes.

Mr. LEVITAS. Would you go back to the second, I think it was your second point. I missed something.

Mr. HEDGE. The site was fully licensed and permitted by the State of Indiana.

Mr. LEVITAS. Then I believe it was the first part.

Mr. HEDGE. That although we could have disposed of the materials in an industrial landfill, we chose them because they had recycling capabilities at Seymour.

No. 3, Seymour Manufacturing Co. seemed to be a financially secure, reputable firm, with knowledgeable personnel. No. 4, a test shipment sent to Seymour Manufacturing Co. was handled properly.

The Seymour Manufacturing Co. continued to perform satisfactorily from 1972 to 1977. They successfully handled the shipments that we forwarded to them. However, beginning in 1977, during routine site visits by IBM personnel, we began to observe problems and brought them to the attention of the site's management with the expectation that they would be corrected.

IBM monitored activities at the site closely. By late 1977, the situation was worsening instead of improving. The problems we discovered included: No. 1, the accumulation of untreated waste; No. 2, mechanical problems with the existing incinerator; No. 3, problems getting a new incinerator permitted and online; No. 4, also, during this time period, the Seymour Co. was in the process of c[illegible]nging ownership, and the operating manager was replaced.

In light of these problems, in March 1978, we stopped all shipments of waste to Seymour. Nevertheless, IBM continued to be very concerned about the conditions at the site and we spent the next 2 years working very hard to get permission to remove IBM's remaining materials from the site.

During this 2 year period, March 1978 to March 1980, prior to any legal initiatives on the part of the Government and also prior to the enactment of Superfund legislation, IBM had numerous discussions concerning removal of IBM drums. These discussions involved the site management, the State, the court appointed receiver after the owners were no longer financially responsible for the site, and, finally, the EPA. Despite these continual efforts on our part, IBM was unable to obtain permission to remove our remaining materials.

In March 1980, there was an explosion and a fire at the Seymour site. This incident clearly demonstrated the inherent danger at the site, and the potential for serious harm. Following the fire, the EPA Region V office assumed control of the site and IBM's continuing request to remove drums labeled as IBM material was finally granted in late March 1980.

IBM sent engineering representatives to Seymour to identify drums which had been shipped to Seymour by IBM and still remained at the site. We utilized two contractors who removed all drums during April 1980 that IBM representatives could identify as possibly having come from IBM. These materials ultimately were incinerated by the Ensco Co. at its permitted facility in El Dorado, AR.

This voluntary effort on the part of IBM involved the removal of approximately 2,500 drums from the Seymour recycling site and cost IBM approximately $1.2 million. As I stated earlier, and again want to reemphasize, to our knowledge, after this April 1980 voluntary effort, there was no identifiable IBM waste on the site.

In May 1980, the Department of Justice sued Seymour Recycling Corp. and the owners and operators of the Seymour site under the Resource Conservation and Recovery Act of 1976.

Our concern for the site did not end with the voluntary removal of our drums. In August 1980, when a group of other companies

which had sent waste to Seymour and which had met previously, called to ask if we were interested in attending the next meeting, we said yes. For the next 2 years, both the generators and the U.S. attorney's office worked on the Seymour problem. IBM supplied the U.S. attorney's office with our invoices and records concerning Seymour. The EPA and the generators separately retained consultants to study the site to determine the best course of action regarding cleanup. Various meetings, information exchanges and the consultants' work continued through 1981 and early 1982.

By midsummer 1982, however, these efforts to reach a cleanup agreement failed and the generator group was disbanded. IBM found the impasse unacceptable, especially considering the deteriorating condition of many of the barrels remaining on the site. Furthermore, the U.S. Government informed the generators that it would bring suit against them under Superfund, unless the generators voluntarily cleaned up the site. Such legal action would have clearly necessitated further delays in the actual cleanup. Therefore, IBM became part of still another effort to formulate a cleanup plan for Seymour.

We, and a few other companies, began to explore possible solutions with the U.S. Government. As Allan Topol will explain in further detail, a proposal was formulated whereby a group of generators who had shipped approximately 50 percent of the waste would participate in a cleanup plan.

Between late August 1982 and October 1982, the details of this cleanup plan were worked out among a group of 24 generators, the EPA, and the Justice Department. At the EPA's insistence, the agreement was to be in the form of a consent decree which would require court approval. Ultimately, the following actions occurred: No. 1, the signed documents were submitted to the State and local governmental bodies for approvals. No. 2, an explanation of the proposed consent decree and cleanup plan was published in the Federal Register to allow for public review. No. 3, the Department of Justice submitted the proposed decree to the U.S. District Court in Indiana. No. 4, finally, after holding 2 days of public hearings on the proposed consent decree, the Federal court found the agreement to be, and I quote, "Fair, reasonable, and in the public interest." We have attached to our statement a copy of the judge's memorandum approving the consent decree.

At this point, let me introduce once again, Allan Topol, outside counsel to IBM, who will provide the committee with more details on the negotiation of the agreement with the Government. Following Allan's statement, I will briefly conclude IBM's presentation.

Mr. LEVITAS. Thank you, Mr. Hedge. And before you begin, Mr. Topol, let me just ask you to clarify one point in that chronology. I gather that in 1980 the first efforts were made to form a generator group to discuss what could be done about cleanup. And as you indicated, that fell apart and then subsequently, the Justice Department, or EPA—someone in the Federal Government indicated that they were contemplating bringing an action under the Superfund law, as I recall your testimony. Can you give me sort of a rough date that that awareness was given to you or to IBM.

Mr. HEDGE. Well, Mr. Chairman, I think I said that they indicated they would bring suit against us—not necessarily under Super-

fund—but throughout the process there were indications from the Government. I think Mr. Topol will be more specific on this.

Mr. LEVITAS. I thought you had said Superfund. That's why I asked the question.

Mr. HEDGE. I just said they were planning to bring litigation against us by October 1982.

Mr. LEVITAS. Fine. Thank you.

Mr. Topol, you may proceed.

Mr. TOPOL. Thank you, Mr. Chairman and members of the committee.

Let me begin with the situation that existed in August 1982. At that time, there were four overriding conditions with respect to the Seymour site. First, there were approximately 50,000 barrels on the site, many of which were rusting and deteriorating.

Second, there appeared to be virtually no chance of any cleanup activity being financed by Superfund money. This was because of a provision in the statute that requires State participation before any funds could be expended for cleanup. In this case, the State's share would have to be 50 percent because the Seymour site was publicly owned, and we had been informed by representatives of the U.S. Government that no State money was available.

Third, we were informed by the U.S. Government that it was considering suit against IBM and other generators unless a settlement could be reached quickly. With more than 300 generators involved, a protracted and expensive litigation which would delay the cleanup seemed almost certain.

Fourth, there had been extensive negotiations with a large group of generators trying to reach a settlement with the Government, but those discussions, as Art Hedge stated, were at a total impasse. The amount of money that this large group had pledged toward a cleanup of this site had been rejected by the U.S. Government as insufficient. It was obvious that the basic concept, whereby all generators would share the cost of the total cleanup on a pro rata basis, simply wasn't working with respect to this site.

At that point, it seemed to IBM that the sensible way to look at this problem was in terms of its logical parts. If it wasn't possible to solve the problem as a whole, perhaps it could be split up into parts. As we saw it, there were two parts here: One was the surface cleanup, and the other was the potential subsurface cleanup.

The alternative would have been to do nothing, take no initiative, permit the barrels to remain at the site, and let the Government sue the generators. We believed that IBM had a good factual defense, namely, that there was no IBM waste remaining at the site because IBM had, voluntarily and at considerable expense more than 2 years earlier, removed all the remaining IBM materials from the site.

Notwithstanding the availability of this defense, however, it seemed to IBM that it made far more sense from everybody's perspective to move in promptly and remove all of the remaining barrels from the site as quickly as possible. This was in the public interest because it would minimize potential subsurface problems. It was in the Government's interest because it had no way to expeditiously clean up this site without a settlement agreement. A court

case would take years to reach a conclusion with the site deteriorating further during that time.

It was in IBM's interest because it would permit the company to avoid protracted litigation. In addition, we believed that the job could be done faster and for less cost if private companies arranged for the work. We recognized that we would have to expend time and effort to do the job ourselves, but we wanted to get this job done.

With this objective, it seemed reasonable to IBM to separate the surface problem from the possible subsurface issue. It was clear that we had to address the surface problem first because, if there was a subsurface problem, it couldn't be dealt with until the surface was cleaned up.

So, with these ideas in mind at the end of August 1982, I sent to Stephen Ramsey at the Department of Justice the proposal that ultimately matured into the Seymour Consent Decree. Negotiations began immediately after Labor Day weekend. I am not certain whether the idea of a small group of generators cleaning up the surface in return for a complete release originated with Mr. Ramsey or with me. I recall that it was first raised in a casual discussion that Mr. Ramsey and I had at the end of June of 1982. There was a delay until this idea advanced to the negotiating stage because IBM and several of the large generators first wanted to try once again to see if there was any possibility of breaking the impasse and reaching a settlement with a large group of generators. By early August 1982, it was clear that such a settlement with a large group would not be possible.

One of the key elements of the settlement negotiations that commenced early in September was that the settling group would be limited to companies, which, in total, sent approximately 50 percent of the waste to the site by volume. This 50 percent requirement was set by the representatives of the U.S. Government. What the Government said was that there were two problems here to be addressed, which the Government viewed as more or less equal in cost, namely the surface and the subsurface cleanups. If the settling group wanted to solve only the first of these problems, that group should limit itself to companies which contributed approximately one-half of the waste to the site. This would then leave the Government, under their theory, free to pursue the remaining generators to remedy the other half of the problem.

Mr. MOLINARI. Would you suffer an interruption, please?

Mr. TOPOL. Certainly.

Mr. MOLINARI. In reference to the statement that the Government indicated that the two problems to be addressed were viewed as more or less equal, can you identify, at this point, which government agency or individuals were involved?

Mr. TOPOL. Certainly. My discussions were with Stephen Ramsey from the Department of Justice. And it was Mr. Ramsey who stated that there were two problems and that they were approximately equal in cost; each of about $15 million.

Mr. MOLINARI. Nobody else was present?

Mr. TOPOL. Oh, there were other people present at a meeting in which we first heard the $15 million figure—it was $15 million, the Government's estimate for surface, and $15 million for subsurface.

That meeting occurred in June 1982. There were a number of people there from the Government, from both the Department of Justice and from EPA. I don't recall who all of the other individuals were. Some I can recall from recollection. I am quite certain John Hammock was there, an attorney from the Department of Justice. I feel fairly certain Charles Goodlow was there. And I am quite certain there were individuals there from the Chicago EPA Region V and possibly officials from EPA in Washington. But Ramsey was presiding. The meeting was at the Department of Justice.

Mr. MOLINARI. It was only Mr. Ramsey that made a statement that the surface cleanup represented half of the total cost of cleanup including ground water?

Mr. TOPOL. Yes. It was Mr. Ramsey who was the spokesman for the Government at that meeting and said the problems were viewed as approximately $15 million each. And then in discussions subsequent to June 1982 in which we were informed that our group should limit ourself to 50 percent of the waste because we were only dealing with half the problem. Those discussions were with Mr. Ramsey. Some of those were discussions that I had privately with him. I also had a discussion with John Hammock.

Mr. MOLINARI. Thank you.

Mr. TOPOL. This would then leave the Government free to pursue the remaining generators to remedy the other half of the problem. How the settling group was to be made up was left to those company representatives who were trying to arrange the settlement.

What occurred was that those of us trying to arrange a settlement accepted the Government's 50-percent requirement. We then started at the top of the government's list of generators by volume, and we contacted companies individually in an effort to pull together enough of a group to do the job.

What we were asking companies is whether they were interested in participating in the funding of a surface cleanup, regardless of the ultimate cost, in return for a complete release of liability.

What we basically did among companies which decided to participate in this group, with the exception of a number of small generators which I will discuss in a minute, was to prorate the costs among ourselves based upon relative volumes of waste sent to the site. We used the Government's volume figures, not because we thought that those were precisely correct, but because we were searching for a simple formula. The idea was that if one company sent twice as much waste to the site as another company, it should pay twice the amount toward the cleanup. In putting together the group, there were several smaller generators who wanted to be included, and a minimum of $100,000 each was set for them.

The settling group never negotiated dollars with the Government. Rather, what we said to the Government was that there are two problems here. We'll take over one of these problems, namely the surface cleanup, and we'll do the work required to solve that problem. We negotiated hard with EPA technical people to reduce to writing the scope of work to be done in the surface cleanup. Ultimately we reached an agreement. That scope of work is contained in a document submitted to the court.

The premise was that the settling group would hire a contractor to do precisely what is included in that scope of work. As indicated, we weren't negotiating dollars with the Government. Rather, we were negotiating a cleanup project. Once the settling group had arrived at a scope of work with the Government and we had a cost figure from a contractor, then, based on EPA numbers, we provided a computer with our volumes of waste sent to the site. We asked the computer to perform the calculations, so that we ended up with enough money. The shares for individual companies were based on their relative volumes, except for the few smaller generators who wanted to participate at $100,000. And that was how the group of 24 settling generators was formed.

The choice of Chemical Waste Management to do this job as the contractor was made solely by the settling group. It was not influenced at all by the Government. It was the view of technical representatives of settling companies that Chemical Waste Management could do a good job at a reasonable price—the ingredients one always uses in selecting a contractor. Moreover, some of the members of the settling group had previous satisfactory experience with Chemical Waste Management.

One of the things I find surprising is the suggestion that being in this group of 24 was a great benefit and that some companies were unfairly excluded. This is purely an after the fact rationalization. What actually occurred was that, as we formed the settling group, we tried hard to persuade companies to join, and in some cases they refused. No small generator willing to pay the $100,000 minimum was rejected. Rather, those who organized the settling group were the ones who had the responsibility not just of forming the group, but of undertaking the technical work that was specified in that thick booklet. We had representatives of Chemical Waste looking at the site, making their estimates, deciding what was to be done to meet the Government's requirements. We had technical people out working with them and working with EPA, because that was our part of the job. It wasn't our responsibilty to hand over the checks to the Government. Our part of the job was to get the work organized, to get it agreed upon, to get it managed, and to get it done.

What I also find surprising is the charge that somehow this agreement was a "sweetheart deal." I wish I could convey to you how intense and hard fought those negotiations were during those 7 weeks in September and October 1982. In the settling group we felt we were operating under time pressure. We had been informed by the Government that it planned to file a lawsuit in mid-October if a settlement wasn't imminent by then. This was in no one's interest, particularly the public interest, because of the resulting delay. We wanted to start the work before winter or else the harsh weather would prevent the work from beginning until spring which would mean more deterioration of barrels and greater environmental harm. It would also mean that because of the time lapse we would lose our fixed price offer from Chemical Waste to clean up the surface.

Each paragraph of the Seymour consent decree was hard fought at length, not only with the Government but among our group of 24. For example, the Government was concerned that our contrac-

tor might not perform satisfactorily. After much argument about contingent liabilities, we finally undertook to arrange for a $15 million completion bond. Initially some in our group didn't want a consent decree; they wanted a simple settlement agreement. The Government was adamant on this point. Eventually the group yielded.

On the latter point, we are glad that the Government prevailed. The consent decree mechanism permitted a full and open public hearing for the settlement. It permitted a U.S. district judge to listen to all who wanted to be heard, and finally it resulted in a judge's determination that this settlement is in the public interest.

And with that, I think I would like to turn back to Art Hedge to conclude IBM's presentation.

Mr. HEDGE. First, Mr. Chairman, let me apologize to you. In checking my statement, when I talked about the October negotiation, that was under Superfund.

Mr. LEVITAS. My question was: When did you first become aware that the Government was threatening such litigation under the Superfund law?

Mr. HEDGE. Allan might be able to answer that precisely.

Mr. TOPOL. We had threats of litigation as early as the 1981 timeframe. We didn't have a specific date, but we knew that the Government was threatening and contemplating litigation.

Mr. HEDGE. Promptly after the judge's approval of the consent decree on December 15, 1982, the cleanup activities began at the site. I am pleased to state that all the materials have been removed from the site in accordance with the consent decree.

We believe IBM has acted very responsibly throughout this process. We have been concerned about the Seymour site since we first detected problems with the site in 1977, and we are pleased to see the surface cleanup now completed. Since this cleanup is one of only a few such major successful cleanups involving multiple generators, IBM considers its involvement with other generators and the Government in reaching this settlement to have been a worthwhile effort.

In conclusion, I would like to summarize IBM's position as follows: We see our efforts in the Seymour cleanup as consistent with IBM's corporate environmental policy. The environment clearly was being adversely affected at Seymour due to deteriorating conditions at the site. Without this effort, which was implemented and financed by private industry, with no public expenditures, reviewed and agreed to by the Government and the court, the cleanup would not now be complete; perhaps not even begun. Such a situation would not have served the public interest.

In the final analysis, IBM is pleased to have been part of this cleanup effort just completed at Seymour.

Mr. Chairman, this concludes IBM's presentation. I would like to ask that the written statements be submitted to the committee and be entered in the record.

Mr. LEVITAS. Without objection, it is so ordered.

I think we are going to hear from the other witnesses before we get into extensive questions, but since you raised the point, Mr. Topol, which was one I had on my list anyway: When you say that you are surprised or whatever that people refer to this as a "sweet-

heart deal," and indeed they do, myself included, but I did not originate that term. And that is what I would like to question you about, because you are intimately knowledgeable about this whole matter. The first time I ever came across or the first reference I have to the term "sweetheart deal" appears in documents which we finally, after a little difficulty, obtained from the Environmental Protection Agency and I am looking at some notes of Mr. Biros—did you have any dealings with Mr. Biros?

Mr. TOPOL. Mr. Biros was at some of the negotiation sessions we had with the Government people. He was a technical individual employed by EPA in Washington, I understand.

Mr. LEVITAS. That's right. He works for the Environmental Protection Agency here in Washington. And in notes which were dated October 1, 1982, these handwritten notes make the following references: It talks about "a proposal AO"—meaning Administrative Order which you made some reference to—"stip performance. Put up a total of $15 million" then in parenthesis, "to is not enough" close parenthesis. "Doesn't give them logical forum," it looks like. And then it says: "Diminishes 50 percent per dollar argument and" quote, "sweetheart deal." Close quote. Let's see, there's one other reference. On October 12, 1982 all to Mr. Biros' notation says: "risk—political. Jim Sanderson. CWM" Which I interpret to mean Chemical Waste Management—"favored treatment. Parenthesis, Jack Anderson's comment, small generators something by a larger members and excluded from group." I think it may be "pushed aside" or something like that. And then it says: "sweetheart deal—50 cents on the dollar."

Now, my experience with notes of this sort is that these almost became buzz words, catch words that Mr. Biros did not dream up on the moment. It was obviously something that was being bandied around someplace by some people. When did you first hear the term "sweetheart deal" and in what context? And could you shed some light for us on why EPA officials in talking about your proposed settlement would have used the term "sweetheart deal?"

Mr. TOPOL. I'm afraid I can't help you as far as the EPA notes. I can tell you that I didn't hear that term in any negotiating session or meeting that I was at with EPA people at all. The first time I heard that term in connection with the Seymour deal, to my recollection, was in a newspaper article after the agreement had been submitted to the court. I can't speak to what context it arose within EPA discussions. It may have appeared in the notes, but certainly it wasn't a term that was discussed, bandied about, or to my recollection, ever used at a meeting that I was at.

Mr. LEVITAS. That is what I am trying to ascertain. It was not a concern that was expressed by you or others of the settling negotiators or to you by the Justice Department or EPA negotiators?

Mr. TOPOL. No. That was not a term or a concept that was a subject in our meetings or in our negotiations.

Mr. LEVITAS. These documents, as I recall, have already been made a part of the record and are therefore public documents at this point. The fact that in October, on at least two occasions, someone is talking about "sweetheart deals" within EPA at relatively high levels is an area that we are still trying to explore. Because, you know, it's pretty obvious—it's clear to somebody that it

was a "sweetheart deal" and listed it as a "political risk" together with Jack Anderson and all of that.

I was most interested to find out whether it was something that was being talked about on both sides of the table. And your recollection is that you had not even heard that term in connection with this proposal until after the court had approved the settlement?

Mr. TOPOL. That is absolutely correct, Mr. Chairman.

Mr. LEVITAS. Fine.

Yes. Mr. Molinari.

Mr. MOLINARI. There are one or two things I would like to clear up, Mr. Topol. Did you represent IBM in this group, or were you lead counselor for all the settlors?

Mr. TOPOL. No. I was counsel only to IBM.

Mr. MOLINARI. Do you know what the total cost of cleanup was for the IBM settling group?

Mr. TOPOL. Yes. The total cost of the cleanup was approximately $7.7 million. We had a fixed price contract and the amount of money was the amount set forth in exhibit A. $7.7 million. I think we are pretty close to being right on the money with respect to the work.

Mr. MOLINARI. We'll get into that in a little more detail. Yesterday, we heard testimony that referred to a study by the Chemical Manufacturers Association indicating that the cost of ground water decontamination would range from $20 to $40 million. Having seen that figure, wouldn't you agree that the 24 settlors wound up with a good deal, if not a "sweetheart deal?"

Mr. TOPOL. We don't know at this point—and we didn't know at the time we entered into this settlement—whether there would be any further subsurface cleanup required. And if so, what the extent or cost would be. The Government said to us that their estimate was $15 million—for which I think Ramsey, at one point, used the term "worst case for subsurface." That is the way they looked at it.

We, at one point in looking at their studies, thought that there was a real possibility that there might not be any cleanup, any subsurface cleanup, required because we had gotten the barrels off in time. We felt we were entering into a settlement as in any settlement, where, to some extent, the jury was out. We would end up paying less money if subsurface cost more. But if subsurface cost less than the figures. the Government figures we were working with, then we would end up paying more money on that same basis. So that's how we were operating, and still feel that until these studies are done, one can't say what, if any, further subsurface cleanup will be required.

Mr. MOLINARI. I get the impression from your client's testimony that in many cases their division had greater expertise than the Government. Indeed, they indicate that they lent that expertise to the Government on occasion in the environmental field. Perhaps at least IBM, based on their expertise, would have had some idea that there would have to be a subsurface cleanup, assuming that indeed they had the expertise they are said to have had.

Mr. HEDGE. Perhaps I can respond to that.

Mr. MOLINARI. I would be happy to have you respond.

Mr. HEDGE. I think most technical experts would tell you without having the surface clean and being able to make an indepth analysis that the most studies that were done could not make a definitive statement with regard to a subsurface problem. And in fact, I understand, that is what the Government is planning to do right now—to undertake such a study.

Going back in history, I would just say to you that we did have an outside consultant look at all the available public data that had been compiled by the various Government agencies with regard to the ground water in trying to give an assessment of potential harm in that area given the site condition. The consultant indicated that potential harm may not be as great as some have indicated it might be. We looked at that site and saw those barrels deteriorating. And we were concerned—our technical expertise told us that unless we got that surface cleaned up, the problem would only get worse.

Mr. LEVITAS. Mr. Bonczek.

Mr. BONCZEK. Yes, sir. I might be able to shed some light on CMA's situation. I think what the CMA testimony is referring to is that $20 to $40 million is a rough approximation for a worst case ground water situation. We at Du Pont have a fair amount of exprience on these sorts of situations, and everyone of these sites is very different. Chemicals that are in a particular site differ dramatically both in the inherent toxicity of a particular chemical, and also in their concentration of the nature of an aquifer if there is one present, and the degree of dispersion of any plume that may be contaminating may differ radically; all these things have a very major impact on how much it would take to clean up a site. I think the $20 to $40 million figure, again, is probably a worst case situation. And given the Seymour situation, I think it would approximate the $15 million very closely.

Mr. MOLINARI. Mr. Hedge, how difficult would it have been for you or anybody else in this group to ascertain, during this period that we are talking about, whether there was a subsurface contamination problem?

Mr. HEDGE. The extent of that problem?

Mr. MOLINARI. I'm not talking about the extent of the problem but the fact that there would have been some degree of subsurface contamination. We have heard a suggestion that there may not have been a contamination problem or at least that was the thought at the time. My question is, how difficult would it have been for you or anybody else or some consultant to get in there and run some tests to determine whether there was contamination at the time.

Mr. HEDGE. My opinion is that to be definitive with regard to the damage would have been very difficult.

Mr. MOLINARI. I don't mean definitive, but just whether there was contamination or not.

Mr. HEDGE. I think empirically we could say, Congressman, that the barrels were there, there was leakage and so there had to be some contamination to the soil.

Mr. MOLINARI. The subsurface soil?

Mr. HEDGE. In fact, we did remove contaminated soil. But that's at one end of the spectrum compared to a major ground water

problem that could have affected a number of aquifers as referred to here. It's difficult to assess to any degree in my judgment.

Mr. LEVITAS. Dr. Chu.

Mr. CHU. I was one of the technical persons reviewing information early in 1982 determining site conditions. And IBM's consultant's report was one of the information I reviewed. I recall the summary said four points. One, surface water based on sediment analysis and fish analysis indicated no significant deterioration. Onsite well samples did show some chemical contamination. However, the consultant was questioning whether the wells were properly installed or whether the samples were contaminated by the surface source.

Third, offsite wells were found to have some contamination, but not significant. However, the consultants indicate that No. 1, they could not determine what was operating information. That means pulling water from off the site. No. 2, they had questioned the sampling procedure and the analytical procedure. And based on their information on the site soil condition, it appeared that the site soil would have higher absorption, would have ability especially for heavy metals.

The last point they made was, based on information from water supply in wells within 1 mile, I believe it was, a radius or 1 mile diameter, I couldn't recall, but none of the wellwater supply shows contamination based on all those informations at that time. It was my technical opinion that there was no ground water problem and therefore we did not perceive that there would be a ground water problem if the concentrated wastes and soils were all removed. And I never agreed, subsequently at Mr. Topol's meeting I was told that the Government estimate was half of the cost to be surface and half the cost to be underground. And I never agreed to that and I don't believe underground would be significantly contaminated if the surface sources were removed. And that has been verified by the recent communication—yesterday Dr. Hirschhorn reported the court information offered this year which showed that the water supplies and the wells were not contaminated.

Early in March I was given an Indianapolis Star newspaper article that said the same thing. It said information available to the reporter shows no wellwater contamination.

Mr. MOLINARI. Doctor, who was the first source that you quoted? Was that a consultant?

Mr. CHU. The consultant information was a consultant hired by IBM which shared information with our technical people.

Mr. MOLINARI. Could we ask that a copy of that report be furnished to the subcommittee?

Mr. HEDGE. Certainly, Mr. Congressman.

Mr. LEVITAS. Thank you.

[Information received follows:]

July 12, 1982

CES 81-081-A

Mr. Allan Topol
Covington & Burling Law Firm
888 16th Street, N.W.
Washington, D.C. 20006

Letter of Transmittal
Report
Evaluation of Site Conditions
and Remedial Work Requirements
Seymour Recycling Center
Seymour, Indiana

Dear Mr. Topol:

As directed by you, Canonie Environmental Services Corp. (Canonie) has conducted an evaluation of site conditions and remedial requirements for the Seymour Recycling Center, Seymour, Indiana.

The results of our investigations are summarized in the attached report. Canonie trusts that the information provided in the report is responsive to your needs. Should you need clarification or require additional information, please do not hesitate to call me.

Very truly yours,

Roberto F. Weiss-Malik
Project Supervisor

RFW-M:skp
attachment

JULY 1982 CES 81-081A

REPORT

Evaluation of Site Conditions And Remedial Work Requirements Seymour Recycling Center Seymour, Indiana

PREPARED FOR

Covington & Burling
Washington, D.C.

TABLE OF CONTENTS

	PAGE
LIST OF FIGURES	i
1.0 INTRODUCTION AND SUMMARY	1
1.1 Introduction	1
1.2 Summary	1
1.2.1 Site Conditions	1
1.2.2 Remedial Work Requirements	3
2.0 SURFACE AND SUBSURFACE CONDITIONS	5
2.1 Regional Hydrogeology	5
2.1.1 Overburden Materials	5
2.1.2 Bedrock Materials	6
2.1.3 Surface and Ground Water	7
2.2 Site Hydrogeology	8
2.2.1 Geology	8
2.2.2 Ground Water	10
2.2.3 Surface Drainage	12
3.0 MIGRATION OF CHEMICALS	14
3.1 Soils	15
3.2 Surface Water	17
3.3 Ground Water	19
3.3.1 Upper Aquifer	20
3.3.2 Lower Aquifer	25
4.0 REMEDIAL PLAN	27
4.1 Evaluation of Requirements and Proposed Remedial Actions	27
4.2 Surface Actions	28
4.2.1 Remedial Plan Elements	28
4.2.1.1 Phase I, Mobilization and Site Preparation	28
4.2.1.2 Phase II, Waste Handling and Disposal	29
4.2.1.3 Phase III, Dismantling of Structures and Soil Removal	31
4.2.1.4 Phase IV, Site Closure	32

TABLE OF CONTENTS
(continued)

	PAGE
4.2.2 Waste Characterization Methods and Procedures	33
4.3 Subsurface Actions	35
5.0 COMPLIANCE OF REMEDIAL PLAN WITH U.S. EPA INTENDED ACTIONS	37
5.1 Actions Intended by U.S. EPA	37
5.2 Compliance of Remedial Plan	37
6.0 REFERENCES	39
FIGURES	
APPENDIX A	

LIST OF FIGURES

Figure No.	Title
1	Site Plan
2	Surface Geology
3	Soil Borings and Water Well Locations
4	Regional Subsurface Profile
5	Bedrock Geology
6	Bedrock Topography
7	Site Plan and Well Locations
8	Subsurface Profile, A-B
9	Subsurface Profile, A-C
10	Subsurface Profile, A-D
11	Ground Water Contours, Shallow Aquifer
12	Ground Water Contours, Deep Aquifer

REPORT
EVALUATION OF SITE CONDITIONS AND REMEDIAL WORK REQUIREMENTS SEYMOUR RECYCLING CENTER SEYMOUR, INDIANA

1.0 INTRODUCTION AND SUMMARY

1.1 Introduction

Canonie Environmental Services Corp. (Canonie) (1408 N. Tremont Road, Chesterton, Indiana, 46304) has completed an evaluation of existing site conditions and remedial work requirements at the Seymour Recycling Center (SRC) located in Seymour, Indiana. The principal objectives of the investigation are stated below.

- o Assess the degree to which materials stored at the site may have affected soil and ground water quality at the site.
- o Develop a remedial work program providing adequate safeguards for human health and safety consistent with the intended remedial actions of the United States Environmental Protection Agency (U.S.EPA).

This report summarizes the results of Canonie's investigations and presents our assessment of present site conditions and requirements for remedial work. Our findings are based on a review and analysis of existing data including published and unpublished reports, data from regulatory agencies, information received through direct contact with state and federal agencies, and a field visit of the site and surrounding areas. Supporting data and site information are referenced throughout the report and are listed in Section 6.0.

1.2 Summary

1.2.1 Site Conditions

On the basis of the existing data and Canonie's analysis of the data, we have developed the following summary of subsurface conditions at the SRC site.

- o The overburden materials at the site can be separated into four distinct layers.

The site is overlain by relatively impervious surface soils. Ground water level observations in borings show this layer to be sufficiently impervious that it functions as the upper confining boundary for the upper aquifer. Further, it is this material that produces the extensive ponding at the site, indicating there is relatively minor vertical flow into the upper aquifer.

The second layer consists of granular deposits and constitutes the upper aquifer at the site.

The third layer consists of silt and clay which is varved at some locations. This layer is an effective aquiclude and serves as the lower confining boundary for the shallow aquifer and the upper confining boundary for the deep aquifer.

The fourth layer consists of saturated granular deposits extending to bedrock. This layer constitutes the lower aquifer at the site. Simplified soil profiles showing the layers are included in Figures 8, 9, and 10.

- Bedrock at the site consists of relatively impervious shale deposits occurring approximately 78 feet below ground surface.

- Both aquifers are used as a source of water supply. The lower aquifer is the more prolific and generally produces high capacity wells.

- Ground water levels in the two aquifers at the site differ, indicating that the aquiclude is effective in preventing flow between them. North of the site, the ground water levels in the two aquifers approach each other, indicating they may be hydraulically connected north of the site.

- The available data indicates that ground water in the shallow aquifer flows from the south towards the northwest. However, ground water in the deep aquifer flows from the north towards the southwest.

- The available data indicates that there has been no significant migration of stored materials into the soils along the perimeter or in the northeastern triangular-shaped portion of the site. The results of available analyses indicate very low levels of a limited number of chemicals commonly dispersed throughout the environment. The sporadic occurrence and low concentrations indicated by the data suggest that they are the result of background levels and sampling or analytical techniques.

- The results of analyses of surface water, fish, and sediments from the general area indicate that there has been no significant degradation of surface waters. In addition, the sediment and fish sampling data suggest that sources upstream from SRC may be responsible for introducing organic chemicals and heavy metals into surface waters.

- Analyses of ground water have identified organic chemicals and heavy metals in samples from the existing on-site wells. Our review of the observation well installations shows that some were improperly installed and are conducting surface water into aquifers.

- Data on ground water samples from the off-site observation wells indicate that there has been no significant migration of chemicals from the site into the shallow or deep aquifers. The data includes sporadic occurrences of low levels of a limited number of ubiquitous chemicals found throughout the environment. It appears from the data that the reported occurrences are due to high background levels, sampling or analytical techniques, and contributions from sources upgradient from SRC.

- The low concentrations of reported chemicals indicate that if they are present, they are strongly adsorbed by the soil particles and are not likely to be mobilized under natural leaching conditions. If in the extreme case leaching occurs, extensive dilution will have taken place before the chemicals reach the ground water or surface water courses.

- Data gathered from water supply wells within one mile of SRC indicates that there is no migration of chemicals into these wells.

1.2.2 Remedial Work Requirements

Canonie's evaluation of the extent of migration of chemicals from SRC indicates that there has been no significant movement of chemicals from the site and no apparent degradation of the existing ground water supply. However, the continued storage of chemicals at the site increases the risk for such migration and warrants the implementation of a remedial effort to remove the potential sources of chemicals. Recent activities at the site, including observation well installation and test pits, are likely to result in ground water degradation not previously observed.

Based on our assessment of site conditions, we have formulated a remedial plan which incorporates various actions addressing surface and subsurface issues. The major aspects of the remedial plan are outlined below.

- Sealing the on-site wells and underground pipes that cross the site boundaries.
- Removing all drums, tanks, structures, and one foot of surface soil. These materials will be disposed of by incineration, treatment, recycling, or land filling.
- Replacing the soil removed with off-site fill.
- Placing a one-foot thick compacted clay cap for site closure. The cap will be graded and seeded.
- Installation of observation wells for ground water monitoring during and following construction.
- Design an alternate water supply source for the community of Snyde Acres.
- Characterize all the materials removed from the site to ensure safe handling and disposal in compliance with applicable manifest requirements.
- The proposed remedial plan meets the requirements of the feasibility studies currently planned by the U.S. EPA.
- Additional site evaluations are not required and the detailed design and preparation of contract documents for the proposed remedial measures should be initiated promptly.

A review of the data indicates that materials reported in the upper aquifer may originate off-site, particularly from the vicinity of Freeman Airport. If additional investigation is contemplated, it should be concentrated in that area.

2.0 SURFACE AND SUBSURFACE CONDITIONS

2.1 Regional Hydrogeology

2.1.1 Overburden Materials

Published regional maps (Gray, 1972; Part B) indicate that the unconsolidated sediments overlying the bedrock at the site consist of lacustrine deposits (Figure 2). These sediments were deposited in glacial, ice-edge lakes during the Pleistocene age. The lakes were intermittent features which at times functioned as drainage channels for glacial meltwater. Accordingly, the lacustrine deposits may also incorporate alluvial deposits and erosional features.

The depositional environment of the lacustrine sediments favors the formation of areally extensive layers of fine grained materials (silt and clay). Depending upon their proximity to the ice margin, certain areas may also contain layers of coarser, granular materials (sand and gravel). In addition, due to the occurrence of alluvial episodes, the lacustrine deposits may have been eroded in places or may contain erosional features, such as buried channels.

The soils found within the upper 60-inches of the overburden materials at the site have been classified by the Soil Conservation Service (1979), as belonging to the Lyles and Ayrshire series. The Lyles soils are predominant and consist of a gray sandy loam (mixture of clay, silt, sand and organic material) formed on water-laid deposits of sandy character. The Ayrshire soils consist of a dark grayish-brown sandy loam formed on windblown deposits of silt and sand. The permeability of both the Lyles and Ayrshire soils is reported as relatively low, varying between 0.6 to 2-inches/hour through the upper 50-inches; and, 2 to 6-inches/hour, below the 50-inch depth.

Canonie's evaluation of conditions at the SRC facility included a review of the logs of water wells located in the general vicinity of the site. These logs supplement the existing site-specific and regional data and provide an independent source of information to confirm and evaluate conditions disclosed by borings drilled on the site.

Twelve logs for water wells located in the general vicinity of the site were on file with the Indiana Department of Natural Resources (IDNR) and the Indiana Board of Health (IBH). The approximate locations of the wells were determined by Canonie from the information on the logs and are shown on Figure 3. The data provided by the well logs has been summarized on the Regional Subsurface Profile in Figure 4. In addition to the well log data, the profile contains the logs of borings drilled as part of an initial site investigation conducted by Toledo Testing Laboratories (TTL), in 1980.

The information provided by the well logs and the profile (Figure 4) indicates that, excluding the surface soils, the overburden materials in the vicinity of SRC may be separated into three major layers. The upper layer consists of principally water-bearing, granular deposits. The upper layer is separated from deeper granular and water-bearing sediments by a layer of clay deposits. The only deviations from this sequence occur at Wells W5 and W7, located to the northeast of SRC, and to the west of SRC (Well W9).

Well W5 was drilled in the east central portion of SRC in 1976. However, the log for this well was prepared during the latter part of 1979, based on the driller's recollections. The well profile differs significantly from the conditions disclosed by the other wells and boring logs and is, therefore, not relied upon in this investigation. Well W7 encountered bedrock at a relatively shallow depth, indicating the presence of bedrock approximately one mile northeast of SRC. Well W9 penetrated only granular deposits for its full length and indicates that the clay layer may be absent to the west of SRC. Well W9 is located over 2,000 feet southwest of SRC.

Figure 4 shows that the elevation of the top surface of the clay layer varies considerably and the depth to the top of the clay increases towards the west. The trend of the clay surface may be indicative of the presence of a "buried channel" incised into the clay deposits. The irregular character of the clay surface indicates that it is an erosional feature. The thickness of the clay layer also decreases towards the west. The decrease in thickness is due to the combined effects of the erosional features on the top of the clay and a gradual rise in the elevation of the top surface of the lower granular deposits.

2.1.2 Bedrock Materials

Regional geologic maps (Figure 5) indicate that the bedrock formations underlying the site consist of siltstone and shale belonging to the Borden group (Gray, 1972; Part A). Based on discussions with the Indiana Geological Survey (IGS), (Henry H. Gray, 1981, Personal Communication), and published descriptions (Indiana Geological Survey, 1970), the siltstone/shale bedrock is likely to be massive and impervious. The IGS has also indicated that the bedrock is non-water-bearing and is not used as a source of water supply.

The topography of the bedrock surface in the vicinity of SRC is illustrated on Figure 6. The map was prepared by the IGS (Indiana Geological Survey, 1981) and is approximate only, showing bedrock contours at 50-foot intervals. The contour trends show that the site is located over a broad bedrock saddle, or divide, separating two buried valley systems; one to the northwest and one to the south.

Figure 4 shows that all the wells located to the east of SRC penetrated shale bedrock (driller's description). Wells W1, W3 and W4 are located approximately 2,000 feet to the east of SRC and encountered bedrock at approximately 80 feet below the ground surface. None of the wells located to the west of the site extend deep enough to penetrate the bedrock formations. However, the Regional Bedrock Topography map prepared by the IGS indicates that the bedrock surface rises west of SRC.

2.1.3 Surface and Ground Water

The surface drainage system in the vicinity of SRC is depicted on Figures 1 and 3. Canonie has assigned "informal" names to the various drainage features in order to facilitate their discussion. The perimeter of the site has been bermed to prevent overland drainage of surface runoff from SRC. In addition, a shallow perimeter ditch is present along the east, south, and west property boundaries and drains into "SRC" Ditch (Figure 1), immediately north of the site. The perimeter ditch effectively intercepts the runoff from the cultivated land to the north and east of the site, including runoff from the Freeman Field runways.

In addition to the flow from the perimeter ditch, SRC Ditch also receives flow from the "G" Avenue drainage ditches, located to the north and east of the site (Figure 1). The flow carried by SRC Ditch enters Freeman Creek (Figures 1 and 3) approximately 1,200 feet to the northwest of the site.

Freeman Creek originates at the Freeman Field Airport (Figure 3) and draws surface runoff from the area to the east and south of the site, including the airport and the industrial park developed on it. After flowing past the site, approximately 900 feet north of SRC, the creek joins SRC Ditch and flows north into Heddy Run (Figure 3). Heddy Run also receives flow from Von Fange Ditch (Figure 3), located north of SRC and originates along the western portion of the City of Seymour. The combined flows from Freeman Creek and Von Fange Ditch are carried westward by Heddy Run where it drains into the east fork of the White River, approximately 1.5 miles northwest of the site.

The water well data indicates that both the upper and lower granular layers are water-bearing and constitute aquifers used for domestic and industrial water supply. The major users of ground water in the vicinity of SRC include Freeman Field, located to the east of the site, and private wells servicing residences at Snyde Acres; a development located approximately one-half mile north of the site (Figure 3). Other private wells servicing farms and individual residences are also found within one mile to the west and northwest of the site.

The Freeman Field wells are high capacity wells which are screened through both the upper and lower aquifers although they draw most of their water from the more prolific lower aquifer. The nearest Freeman Field well (W1)

is located within 1,500 feet east of SRC (Figure 3). Most of the residential wells at Snyde Acres and other adjacent areas are shallow, driven wells screened in the shallow aquifer only.

The static water level data reported on the water supply well logs (Figure 4) indicates ground water levels between 10 and 20 feet from the ground surface. Since most of the water supply wells to the east of SRC are screened both through the upper and lower aquifers, the reported levels probably represent the combined levels of ground water in the upper and lower aquifers. To the west of the site the clay aquiclude is missing and the upper and lower aquifers are probably hydraulically connected.

2.2 Site Hydrogeology

The subsurface conditions in the vicinity of SRC have been described in several reports summarizing the results of field investigations initiated by the U.S. EPA. A brief description of the subsurface data they provide is summmarized below.

- "Hydrogeological Report, Seymour, Indiana". Prepared by Toledo Testing Laboratories (TTL) in 1980. The investigation included three soil borings and thirteen observation wells. The locations of the wells are shown on Figure 6.

- "Groundwater Survey-Seymour Hazardous Waste Site". Prepared by K. V. Associates (KVA) in 1980 following completion of the TTL report. This investigation included measurements of the rate and direction of groundwater flow in the shallow aquifer in the area north of SRC.

- "Groundwater Contamination Study, Seymour Recycling Center, Seymour, Indiana". Prepared by Environmental Science and Engineering (ESE) in 1982. This study included soil borings, a geophysical survey, and observation wells. The well locations are shown on Figure 7.

- "Extent of Soil Contamination and Location of Buried Materials at the Seymour Recycling Facility Near Seymour, Indiana". Prepared by Ecology and Environment (E&E) in 1982. This study consisted of geophysical surveys and 21 soil borings around the perimeter of the site and in the triangular-shaped northeast portion of SRC.

2.2.1 Geology

The information provided by the boring logs presented in the TTL (1980) and ESE (1982) reports has been summarized on the subsurface profiles shown on Figures 8, 9, and 10. The locations of the borings are shown on Figure 7. The borings drilled as part of the E&E investigation (1982) extended only to 11.5 feet and the logs are not included on the profiles. However, Canonie has incorporated the information from the E&E investigation into our evaluation of subsurface conditions.

Excluding the surface soils, the subsurface conditions disclosed by the borings confirm the three-layered overburden profile indicated by the water well logs (Figure 4). Although there are some variations in the soil descriptions provided by each of the three studies, the sediments in the vicinity of the site may be characterized as follows:

- The upper layer consists of water-bearing, sandy deposits containing variable amounts of fines (silt and clay), minor amounts of organic materials, and seams of silt and clay. This layer represents the upper aquifer indicated by the well logs, and based on its variable character and the presence of organic materials, is probably alluvial in origin. Generally, the upper aquifer is overlain by surficial deposits of variously proportioned mixtures of sand, silt, and clay.

- The middle layer consists of clay and silt deposits which are varved in character at some boring locations. These sediments are relatively impervious and represent the aquiclude indicated by the water well logs. The varved character of these sediments indicates that they were formed in a lacustrine environment.

- Below the clay layer and extending to the top of the bedrock surface, the borings indicate the presence of a layer of saturated, granular deposits consisting largely of sand with minor amounts of gravel. These sediments constitute the lower aquifer disclosed by the water well logs. At borings 140 and 132 (Figure 9), the granular sediments are separated from the bedrock by layers of silt and clay.

- Bedrock was penetated at a depth of 78.0 and 79.0 feet below the ground surface at borings 140 and 145, respectively. The bedrock is described as red, laminated, waxy shale.

The surface soils over the upper aquifer have been described in the existing site reports as sandy loam (Soil Conservation Service, 1979), a mixture of organic matter, sand, silt, and clay; sandy clay (loam) deposits, (KVA, 1980); clayey, silty, sand loam (ESE, 1982); and clayey, silty sand to sandy, silty clay (E&E, 1982). These descriptions imply the presence of fine grained materials (silt and clay) and relatively low permeabilities. Our review of the ground water observations made by KVA, ESE, and E&E during and after drilling indicates that surface deposits confine the upper aquifer and are, therefore, relatively impervious. As discussed under Section 2.2.2, the available data places the bottom of the impermeable surface deposits approximately 8 feet below the ground surface.

The available boring data is not sufficient to fully define the degree of variation in the character and continuity of the aquiclude separating the lower and upper aquifers under the site. No borings have been drilled

within the site itself. However, as discussed in the following section, the water level data indicates that in the immediate vicinity of SRC the aquiclude is effective in separating the upper and lower aquifers. In addition, the boring log descriptions, regional water well data, and ground water level observations suggest that the aquiclude may not be present to the west and north of SRC, or may become more permeable to the north.

2.2.2 Ground Water

Thirty-one observation wells have been installed at the site during the course of the TTL and ESE investigations. Several of these wells monitor the ground water levels in the deep aquifer.

Ground water levels were observed in the course of drilling and have been monitored in the observation wells periodically following installation. The latest set of observations was obtained on several dates during the course of the ESE (1982) investigation. These are summarized in their report. The most complete sets of simultaneous readings were taken by ESE on July 16, and August 11, 1981. Neither set of observations includes measurements in Wells 10, 11, 12, and 13 which are located within the site. Well 7 was omitted from the July 16, measurements. Accordingly, we have utilized the August 11, readings in our evaluations since they provide the most complete set of observations.

The available data shows that the ground water levels and gradients of the two aquifers differ at and in the vicinity of the site. The differences are maintained by the clay aquiclude separating the aquifers. The ground water level in the deep aquifer is located well above the base of the confining layer (the aquiclude) and is therefore defined as artesian (confined). However, the upper aquifer has been defined as an unconfined aquifer in the previous reports. Our analysis of the data for the shallow aquifer indicates that the surficial soils are sufficiently impervious to act as a confining layer. During drilling, when the base of the surficial soils is penetrated, water rises in the hole, indicating that this aquifer is artesian. It is possible, however, that during extensive dry periods, the water level in the upper aquifer drops below the base of the surficial soils. It is then correctly defined as an unconfined aquifer.

The contours of the ground water surface in the shallow aquifer are shown on Figure 11. The contours show that the ground water levels decrease to the north. Since ground water flow occurs downgradient (perpendicular to the contour lines) the general direction of flow in the shallow aquifer is from the south towards the northwest. The gradient of the shallow aquifer is steeper south of the site than to the north and flows in a more northerly direction. The ESE (1982) report presents a ground water contour map for the shallow aquifer. The ESE map is based on the July 16, 1981 readings and is in close agreement with the contours shown on Figure 11. The northwesterly flow of the shallow aquifer along the north boundary of the

site has also been confirmed by the results of the earlier KVA (1980) study. Ground water flow meter data confirms the northwest direction of flow in the shallow aquifer.

The ground water level contours of the deep aquifer are shown on Figure 12. The contours show that ground water flow in the deep aquifer is towards the southwest. Our assessment of the direction of ground water flow in the deep aquifer is based on the following considerations:

- We believe Well 9 is located in the shallow aquifer although it has been reported by ESE as a deep aquifer well. The readings at Well 9 are anomalously high when compared to other deep aquifer wells (Wells 132, 140, 145, 7, 8, and 143). Based upon a review of the boring log for this well and comparison of the shallow aquifer levels measured in the adjacent Well 6, we have concluded that Well 9 was installed above the aquiclude (TTL, 1980) and therefore reflects the water level in the shallow aquifer. This conclusion is supported by the fact that the ground water levels in Well 6 and Well 9 are generally very close. Accordingly, we have designated Well 9 as a shallow aquifer well and have not used it to define the trends of the deep aquifer.

- The ground water levels at Wells 132 and 140 indicate that the two aquifers approach the same level north of SRC. This suggests that the upper and lower aquifers are hydraulically connected at some point to the north of Well 132, due to the absence of the aquiclude or an increase in its permeability. Therefore, the water levels at these locations are influenced by the combined levels of the two aquifers. We believe that in this area the shallow aquifer recharges the deep aquifer and that the gradient of the deep aquifer in the area between Wells 140 and 132 reflects this condition since it shows a dramatic leveling effect as compared to the gradient south of Well 140. We have not attempted to draw water level contours for the deep aquifer levels north of Well 140. However, it appears that, north of Well 140, the deep aquifer levels rise slowly, eventually reaching the shallow aquifer levels at some distance north of Well 132.

Canonie's analysis of the ground water level data obtained during drilling and after installation of the observation wells indicates that the shallow aquifer is confined at least a part of the year. The KVA report indicates that while drilling the augered holes for the flow meter measurements, ground water was first encountered between 8 and 9 feet below the ground surface. The ground water was "under some pressure and would enter rapidly, fluidizing the sandy loam deposits until eventually stabilizing at a depth of 6 to 7 feet below grade" (KVA, 1980). The ground water level data provided in the ESE report also indicates that, with the exception of Wells 140 and 143, the ground water levels encountered during drilling were, on

the average, 2.1 feet lower than those measured after the installation of the wells. Similar changes in the level of ground water after drilling were reported during the E&E investigation. Their report indicates that at borings 1, 2, and 16 (these are the only E&E logs which record the ground water levels during drilling) ground water was first encountered between 6 and 10 feet below from the ground surface. Upon completion of the borings the water levels rose to between 4.7 and 6.0 feet below the ground surface. The ground water level data obtained in the shallow aquifer and the uniform observations of water level conditions during drilling confirm that the surface soils act as an effective impervious seal capable of maintaining a two-foot head of pressure. While this condition may be seasonal, it is, nevertheless, a positive indicator of the impermeable nature of the surface soils; a characteristic that is not seasonal.

The impermeability of the surface soils is further demonstrated by the extensive ponding that occurs at the site and persists for long periods after rainfall. This condition has been observed and noted by Canonie and other investigators.

Data from boring logs show that the impermeable surface soils at the site extend to a depth of eight to ten feet below the ground surface. Accordingly, this layer is effective in preventing surface water seepage into the shallow aquifer.

The water supply wells servicing Freeman Field are located east of SRC and draw their water principally from the deep aquifer. Well W1 (Figure 3) is located within 1,500 feet of SRC and its radius of influence may extend to the site. The ESE (1982) investigation included an aquifer performance test to assess the influence of this well (designated as Airport Well 5 by ESE) on the deep aquifer levels under SRC. The water level in Well W145 was depressed 2.9 feet due to pumping at W1, indicating that the radius of influence of W1 does extend to the site and it is located in the deep aquifer.

2.2.3 Surface Drainage

The existing site topography slopes from the south downward toward the north and therefore directs drainage of surface runoff towards the north. Prior to 1980, most of the runoff was discharged into SRC Ditch, immediately north of the site (Figure 1), or was channeled into the sewer line which originates at SRC and extends to the northeast. During 1980, the U.S. EPA directed the construction of a berm around the perimeter of the site to prevent the drainage of surface runoff from SRC directly into the nearby streams. Concurrently, an interim system was installed to treat the runoff accumulated within the berm prior to its release. The berm appears effective in capturing and holding surface runoff on the site. The E&E report (1982) indicates a significant amount of ponding in the northeastern triangular-shaped portion of the site at the end of May, 1981. Observations made by Canonie on May 28, 1981, and June 1, 1982, confirm the E&E observations and

indicate that as a result of the berms, surface runoff is effectively captured and ponded over significant portions of the site.

The ESE (1982) and KVA (1980) investigations included assessments of the degree of hydraulic connection between the shallow aquifer and Freeman Creek north of SRC (Figure 1). Both investigations conclude that the creek and the shallow aquifer are hydraulically connected, and that Freeman Creek is recharged by the shallow aquifer during the wet season. During the dry season, the relationship may be reversed and the creek then serves as a source of recharge to the shallow aquifer.

3.0 MIGRATION OF CHEMICALS

The U.S. EPA has initiated several studies to assess whether chemicals stored at the facility have migrated into the soils, surface waters and ground water in the vicinity of SRC. Most of these studies were conducted as part of the site investigations previously described under Section 2.2, Hydrogeology. The following listing provides a brief summary of the available data.

- o "Final Report to U.S. EPA, Analytical Data, Seymour Recycling Center". Prepared by O.H. Materials (OHM) in 1980. During this study, 286 samples of soils, surface and ground water, drums and tanks were collected from both on-site and off-site locations. The samples were analyzed for acid and base-neutral organic compounds, heavy metals, cyanides, chlorinated solvents, oxidizing and reducing agents, and phenols. The report provides a qualitative summary of the results of analyses of 30 samples of surface water and sub-surface water.

- o KVA (1980) investigation. This study was limited to the area north of SRC and included the sampling of surface water and ground water recovered from shallow wells installed along stream banks. The samples were tested for conductivity and a qualitative assessment of the presence of fluorescent organic compounds.

- o "Contaminants in Sediments and Fish in the Vicinity of Seymour Recycling Corporation, Seymour, Indiana". Prepared by the United States Fish and Wildlife Service (U.S. FWS) in 1981. This study included the sampling and analysis of sediments and fish from streams, upstream and downstream of SRC for volatile organic compounds, pesticides, PCB's, and heavy metals.

- o ESE (1982) investigation. This study included the sampling and analysis of ground water from the deep and shallow aquifers. The analytical program included 24 analyses for organic compounds and 13 analyses for heavy metals. In addition, the study included geophysical surveys to assess the presence of chemicals in the ground water throughout the vicinity of the site.

- o E&E (1982) investigation. During this study, 84 samples of soil from the perimeter and the northeastern area of the site were obtained for organic compounds and heavy metals analyses. Prior to the analyses, the samples were screened with an organic vapor analyzer to assess their total content of organic vapors. Based on the results of the screening, 20 samples were selected for detailed organic compound analyses and 11 samples were tested for heavy metals. The investigation included geophysical surveys throughout the northeastern portion and along the perimeter of the site to

locate buried objects and an assessment of the presence of chemicals in the ground water.

3.1 Soils

The only investigation of the presence of chemicals in the soils at SRC was conducted by E&E (1982). The scope of the study was limited to an assessment of conditions along the perimeter of SRC and throughout the triangular-shaped, northeastern portion of the site. This area was used for drum storage prior to 1980. During 1980, the U.S. EPA directed the transfer of all drums in this area to the main portion of the site. There are no drums stored there at this time.

The investigations conducted by E&E included a preliminary screening of 84 soil samples obtained from shallow augered holes (11.5 feet deep), with an organic vapor analyzer (OVA). Four samples were obtained from each boring at 0-1.5 feet, 2 5-4 feet, 5-6.5 feet, and 10-11.5 feet. Based on the results of the screening program, the samples were characterized as showing "no response", a "small response", or a "strong response". The results of the screening were further characterized on four maps of the site, one for each of the sampling horizons, showing the boring locations at which the soil samples indicated positive responses.

Following the screening procedure, samples were selected for volatile organic and heavy metals content analyses. Twenty volatile organic and 11 heavy metals determinations were conducted on samples from various depths at several boring locations. The E&E report concludes that the screening and analytical data indicates that volatile organic chemicals are present in the samples from the borings in the northeastern area of the site and at one boring located near the southwest corner of SRC. The report further delineates the extent of chemical-bearing soils for each sampling horizon.

Canonie's review of the E&E data indicates that the reported chemicals are relatively common industrial compounds and were found only in low concentrations. The data also indicates that there is no defined pattern of occurrence, either horizontally or vertically. The sporadic occurrence and low concentrations indicated by the analyses suggests that they are due to background levels, sampling, or analytical techniques. In addition, the low concentrations of the reported chemicals indicate that, if they are present, they are strongly adsorbed by the soil particles and are not likely to be mobilized under natural leaching conditions or, if leached, will be highly diluted before entering surface or ground water.

Accordingly, our evaluation of the analytical data indicates that there has been no significant migration of volatile organic chemicals or heavy metals into the soils along the perimeter or in the northeastern portion of the site.

Our conclusions are based on the following observations:

- The laboratory analyses indicate sporadic occurrences and very low concentrations for the major portion of the organic chemicals that were identified. Of the 19 chemicals that were identified with certainty, 10 are isolated occurrences in single, separate samples. The remaining 9 chemicals were identified in more than one sample. Of these, Bis(2-ethylhexyl) phthalate, methylene chloride and trichlorofluoromethane occur most frequently or at higher concentrations. Trichlorofluoromethane was reported in 9 samples at a concentration of 0.01 µg/g. Methylene chloride was reported in 17 of the samples at concentrations varying between 0.01 and <1 µg/g. In 15 of the samples, methylene chloride levels were below 0.1 µg/g. Bis(2-ethylhexyl) phthalate was reported for ten of the samples in concentrations varying between <0.2 and 50 µg/g. The reported levels of trichlorofluoromethane and methylene chloride are very low. At the reported concentrations, variations introduced by high background levels or sampling and analytical techniques are significant. Methylene chloride in particular, is a ubiquitous chemical which is routinely found in "uncontaminated" samples. For instance, the ESE (1982) report indicates that methylene chloride was detected in the blank (control) sample as well as in the ground water sample well upgradient from SRC. Phthalates also constitute a fairly common background chemical. As an example, the U.S. FWS (1981) investigation reported bis(2-ethylhexyl)phthalate concentrations of 8.7, 3.3, and 36 µg/g in sediment samples obtained from surface streams upgradient from SRC. It is significant that the highest level of bis(2-ethylhexyl)phthalate (36 µg/g) reported in the U.S. FWS study was detected in a sample obtained from Freeman Creek (Figure 1) approximately one mile upgradient from the site.

- The Organic Vapor Analyzer (OVA) screenings represent qualitative assessments of the presence of organic vapors and do not provide the data required to ascertain the presence or character of the organic compounds or their concentrations. The limitations of the OVA data are best exemplified by comparing the results of the laboratory analyses to the screening data. There is no apparent correlation between the presence or number and concentration of chemicals reported by the laboratory analyses and the response or strength of the OVA screenings. Accordingly, since the laboratory analyses do not confirm the results of the OVA screening, the use of the OVA data to delineate areas of soil containing volatile organic chemicals is not valid.

  The occurrences and concentrations of chemicals with depth, as well as between borings, are sporadic and do not reflect any patterns of chemical migration, either vertically or horizontally. In many

instances specific chemicals were identified at single sampling locations only. In addition, at many of the boring locations where samples from different horizons were analyzed, the analyses report chemicals at some horizons but at sampling horizons above, report no chemicals, lower concentrations of the same chemicals, or indicate that the same chemicals are absent. In view of the relatively impermeable nature of the surface soils, it is unlikely that significant vertical migration of fluids takes place through them. In addition, it is reasonable to expect that chemicals identified at deeper sampling horizons would also be reported at the sampling horizons above them. Since this trend is not reflected in the available data, the reported presence of chemicals in the surficial soil samples may be due to other factors including background levels and sampling or analytical techniques.

- The results of the inorganic determinations show a wide range of fluctuation and appear to reflect natural variations. A full evaluation of the significance of these determinations requires an adequate data base of "typical" values for the soils in this general area since concentrations of metals in natural soils vary widely. This information is not available. However, two of the samples were secured from a boring located approximately 150 feet south of SRC (samples 21-3 and 21-4). Since this sampling location is upgradient from the site, it may be considered to have been relatively unaffected by past activities. A review of the data indicates that the samples showing the 6 highest and 3 second-highest levels of metals were obtained from the upgradient boring. In addition, at the downgradient locations where the highest concentrations of the remaining 7 metals were identified, the reported values appear to reflect only the high end of the range for this particular group of samples.

3.2 Surface Water

The OHM (1980), KVA (1980) and U.S. FWS (1981) investigations included sampling of water, sediments and fish from surface streams in the general vicinity of the site. In addition, the Indiana Board of Health has also sampled surface waters on various occasions (Indiana Board of Health, 1981).

Analyses of the samples obtained during the OHM (1980) investigation and those obtained by the Indiana Board of Health (1981) report the presence of several volatile organic chemicals and heavy metals in surface water samples from the site (water ponded on the ground surface), and from the SRC Ditch.

The KVA (1980) investigation included determinations of conductivity and fluorescence of water samples obtained from SRC Ditch and Freeman Creek.

Based on the results of these qualitative analyses, the report concludes that petroleum related aromatic organic compounds were detected in the surface water samples. The report also concludes that the presence of these compounds is due to storm runoff from SRC and exfiltration of ground water bearing organic compounds from SRC into the stream. The report also indicates that aromatic organic compounds were detected in water samples obtained at the confluence of Heddy Run with Freeman Creek.

As indicated in other sections of this report, the available analytical data indicates that there is no significant migration of chemicals from the site through the ground water system and that the observed resistivity and fluorescence responses may be due to contributions of heavy metals and organic compounds from other sources upstream from SRC.

The U.S. FWS (1981) also conducted an investigation which included the sampling of fish and sediments at various stream and river locations downstream and upstream of SRC. The results of these analyses indicate the presence of heavy metals and organic compounds in the fish samples collected at all locations. Our review of the analytical data for the fish samples does not indicate any significant differences in the content of organic compounds or heavy metals between the upstream and downstream samples.

The fish samples also included analyses of a single, dead carpsucker which was found floating in the east fork of the White River approximately 0.1 miles downstream of its confluence with Heddy Run. The death of the carpsucker was attributed to high ethyl hexyl phthalate levels. In our opinion no valid conclusions may be drawn from the data provided by the carpsucker analysis since the location of its normal habitat is not known.

The results of the sediment analyses reported by the U.S. FWS do not indicate any significant changes in the concentrations of heavy metals or organic compounds at stations downstream from SRC. In fact, the data indicates that the concentrations of most heavy metals and several of the organic compounds are higher in the samples obtained from Freeman Creek, upstream from SRC, than they are immediately downstream from the site.

The increased levels observed upstream of SRC are particularly significant since they indicate high background levels for this area from upstream sources. Accordingly, the resistivity and fluoresence responses noted during the KVA (1980) investigation may reflect the contributions of heavy metals and organic compounds from upstream sources. The sampling location showing elevated heavy metal and organic compound concentrations is situated downstream from the Seymour Airport, Freeman Field, and upstream from SRC. Contributions of heavy metals and volatile organic chemicals from the airport may be expected to occur due to aircraft maintenance, fueling, and repair activities.

Canonie's evaluation of the potential for migration of chemicals into surface waters has also included an assessment of the effects of the berms constructed at the direction of the U.S. EPA. Our review indicates that the berms have increased the potential for migration of chemicals from the site. As noted in previous discussions, the construction of the perimeter berms has led to ponding of surface runoff over significant portions of the site. The ponding of water has increased the potential for subsurface migration of chemicals since the contact time and total volume of water which may come into contact with chemicals potentially present at the site and the total head of water acting on the unsaturated surface soils have been increased.

3.3 Ground Water

The potential migration of chemicals into the ground water at and in the vicinity of SRC has been evaluated as part of the OHM (1980), KVA (1980), ESE (1982), and E&E (1982) investigations. These studies included sampling and analyses of ground water from the observation and water supply wells and geophysical assessments to define "plumes" of ground water-bearing chemicals. In addition, the Indiana Board of Health (1981) has sampled the observation wells and a number of water supply wells on various occasions since 1978. The results of their analyses of ground water samples from a relatively large number of water supply wells located within one mile of SRC indicate that they have not been affected by any chemicals which may have migrated from the site. The OHM (1980) analyses included sampling and analyses of the "Otte" well (located approximately 0.5 miles to the northwest of SRC) and one of the wells at Freeman Field (not identified). The results of these analyses indicate the absence of chemicals at the airport well. The analyses for the "Otte" well sample indicate the absence of organic chemicals and report the presence of 13 µg/l of chromium. The reported chromium level is above the drinking water standards of 5 µg/l.

The ESE analyses included samples (two samples were taken from the "Otte" well, one was used as a duplicate) from the "Otte" well and a sample from the airport well closest to SRC (Well W1, Figure 3). The analyses report low levels of methylene chloride (trace to 48 µg/l), trace levels of toluene and chloroform, and low levels of chromium (none to 20 µg/l at the "Otte" well, 30 µg/l at Well W1), and cadmium (15 µg/l at Well W1).

The ESE (1982) report concludes that the methylene chloride and toluene determinations are not indicative of the actual presence of these chemicals in the wells but probably reflect analytical background levels. Toluene was reported at levels below detection limits (it was identified in only one of the "Otte" well duplicate samples) and is also considered to be due to analytical background levels.

The chromium levels reported for the "Otte" well are very low and are not accompanied by elevated levels of other organic or inorganic chemicals. In addition and as discussed in the following section, the analytical data from the observation wells indicates that migration of chemicals from the site and into the ground water has not occurred. Accordingly, we have

concluded that there has been no migration of chemicals from SRC into the "Otte" well and that the low levels of chromium detected at this location are due to either analytical background levels or localized conditions at the well itself. The same comments and conclusions apply to the airport well, W1 (Figure 3).

3.3.1 Upper Aquifer

Analyses of ground water samples from the upper aquifer at the site were conducted as part of the OHM (1980) investigation, KVA (1980) investigation, and ESE (1982) investigation. The shallow aquifer data also includes the results of analyses performed by the Indiana Board of Health (1981) as well as the results of geophysical surveys conducted during the ESE and E&E (1982) investigations.

The OHM data incorporates analyses of ground water samples obtained from the observation wells installed during the TTL (1980) investigation, a sample from the existing on-site water supply well, and samples obtained from shallow test pits excavated with a backhoe. The TTL wells and the on-site water supply well were also sampled by the Indiana Board of Health during July, 1980. The results of these analyses indicate the presence of organic and inorganic chemicals in the samples. The data also indicates that the highest levels of chemicals occur in samples obtained from locations within the site itself and are significantly lower in samples obtained from locations outside and adjacent to the property boundary. Our review of the Indiana Board of Health and OHM data indicates that the reported chemicals may be due to cross-contamination of samples from surface sources and does not establish that chemicals have migrated through natural sources into the shallow aquifer. Our conclusions are based on the following observations:

- o During Canonie's site visit of May 28, 1981, we observed two wells along the northern site boundary which did not have caps, were located at ground level (top of open pipe), and were not sealed at the surface. The annular space between the borehole and the pipe was empty to a depth of approximately 6 feet, indicating the backfill materials sealing the wells at the surface had caved in after installation. The observed well installations are subject to cross-contamination from surface sources since they allow inflows of surface runoff around the annulus of the well and direct inflow of surface runoff into the well casing itself. In addition, the upper aquifer wells were installed in shallow pits excavated with a backhoe (apparently the wells were driven below the bottom of the pits). Because of the method of installation, it is doubtful that adequate surface seals were established during backfilling. The excavation and backfilling of the pits may also be expected to have introduced chemicals which may have been present at the surface deeper into the surface soils.

- The ground water samples obtained from the shallow pits are likely to have been contaminated with chemicals which may have been present at the surface or which adhered to the excavating equipment from previous locations.

- Excavation of the pits below the level of the confining surface soils has led to the creation of several "windows" into the shallow aquifer. It is likely that the permeability of the backfill in the pits is higher than the original undisturbed permeability. Accordingly, the backfilled pits may be allowing the flow of surface water directly into the upper aquifer, particularly during ponding. As a result, chemicals which may be leached from the backfill, as well as any chemicals which may be present in the surface runoff, will also reach the shallow aquifer wells adjacent to the pits.

The KVA (1980) investigation included determinations of the conductivity and fluorescence of water samples obtained from shallow wells installed along the banks of SRC Ditch and Freeman Creek. Based on the results of these qualitative analyses, the report concludes that petroleum-related aromatic organic compounds were detected in the shallow aquifer samples and postulates the presence of a plume of ground water which extends to the north of SRC and contains petroleum-related aromatic organic compounds. The presence of the plume was postulated from the bank samples only (since no intermediate sampling between Freeman Creek and the site was conducted). In addition, the presence or character of the organic compounds was not confirmed by laboratory testing. Our review of this data indicates that the observed fluorescence and resistivity responses may have been due to the presence of chemicals from sources upstream from SRC. Our conclusion is based on the following observations:

- Neither the character nor concentration of the chemicals responsible for the observed fluorescence and resistivity responses has been determined. Accordingly, no definitive conclusions may be drawn from this data as to the significance and source of materials responsible for the responses.

- As indicated by the results of the U.S. FWS (1981) investigation, surface waters in the vicinity of SRC may contain chemicals from sources upstream of SRC. These chemicals may have been responsible for the observed responses. During high flow periods, Freeman Creek recharges the aquifer through infiltration into the stream banks. Accordingly, chemicals contained in the surface water will be transported into the creek's banks and the aquifer. Thus, sampling of the creek banks is biased and may be easily affected by sources of chemicals upstream from SRC.

The ESE investigation included the analysis of 17 samples obtained from 15 shallow aquifer wells and one blank (control) sample. The analyses incorporated two sets of duplicate determinations for the samples obtained from Wells 141 and 149. All the samples were analyzed for volatile organic compounds and inorganic compounds. The analyses reported the presence of 11 volatile organic compounds and 4 inorganic compounds. In most cases, the organic compounds that were identified with certainty occurred at trace levels below the 10 µg/l detection limit of the analytical equipment. Of 40 reported occurrences, 30 were reported as "trace". The analyses also identified methylene chloride, methyl bromide and vinyl chloride at levels above "trace", in 9 of the samples (10 occurrences), and various levels of cadmium, chromium, sodium and TOC in 8 of the samples (12 occurrences). In most cases the occurrences of compounds which were identified with certainty are sporadic and do not show any defined pattern of distribution from well location to well location. In addition, the concentrations of the three compounds identified at levels above trace show a great degree of variance from location to location as well as in the duplicate samples.

Our review of the analytical data indicates that there is no significant evidence of migration of chemicals from SRC into the shallow aquifer. Our conclusion is based upon the following considerations:

- Most of the compounds identified with certainty occur at trace levels below the detection limits of the analytical equipment. At these levels, the variations introduced by sampling and analytical techniques are significant and diminish the validity of the determinations. Since the significance of the trace levels is questionable, the use of this data to delineate the extent of ground water-bearing chemicals is inappropriate.

- Methylene chloride is the most frequently reported compound with the highest levels. This is a ubiquitous chemical which is frequently found in "uncontaminated" samples. The analysis for the blank (control) sample indicates the presence of 12 µg/l of methylene chloride. The highest methylene chloride level was reported to occur in Well 148, approximately 800 feet upgradient (south) of SRC and was also reported to occur in each one of the duplicate samples at Wells 141 and 149 but was not reported in the second sample at each location. Accordingly, we have concluded that the occurrence of methylene chloride is not significant and probably reflects variations due to analytical or sampling techniques. The ESE (1982) report also indicates that the methylene chloride data is not reliable and cannot be used as an indication of the migration of organic compounds in the shallow aquifer.

- Methylene bromide above detection limits (73 µg/l) was reported to occur at one well location only, Well 134. Well 134 is located to the north of the east-west creek, perpendicular to the flow direction of the shallow aquifer. The single occurrence of this compound at very low levels and the location of the well indicate that the reported value may reflect sources other than SRC and sampling or analytical techniques.

- Vinyl chloride was reported to occur at significantly different concentrations in the duplicate samples from Well 141 only (1240 and 740 µg/l). The large difference in the concentrations of the duplicate samples as well as the occurrence of this compound at one well location only indicates that it is not reliable and may be due to sampling or analytical techniques. In addition, vinyl chloride is frequently found in association with the use of PVC piezometers.

- The inorganic compound determinations identified only two significant metals, cadmium and chromium. Sodium and TOC were also reported for some samples. The sodium and TOC data is inconclusive since there is no other data to indicate the normal range of variation of these parameters in this area. The cadmium and chromium occurrences are isolated and show a wide range of fluctuation. In addition, cadmium was reported at the upgradient well and chromium was reported in only one of the two duplicate samples from Well 149 ("Otte" well). The highest cadmium and chromium levels were reported at Well 131 (270 and 60 µg/l respectively), and at Well 133 (40 µg/l cadmium and 20 µg/l chromium). Both of these wells are downgradient from SRC and are located along and immediately to the north of Freeman Creek. A number of other wells are located between Wells 131, 133, and SRC. None of the intermediate well samples was reported to contain chromium or cadmium. The absence of cadmium and chromium in the samples upgradient of Wells 131 and 133 indicates that the reported values are probably due to sources other than SRC (possibly due to infiltration of surface water from Freeman Creek) or sampling and analytical techniques.

The ESE (1982) and E&E (1982) investigations included the performance of geophysical surveys to assess whether any chemicals have migrated into the shallow aquifer. The surveys consisted of EM (electromagnetic) conductivity measurements of the areas adjacent to the main portion of the site, but did not include the site itself. The ESE investigation covered an area approximately 3,000 by 4,000 feet in plan, which was centered on the site. The E&E investigation included a survey along the perimeter of the site and at the northwestern triangular-shaped portion of SRC.

The results of the ESE survey were reported in the form of a map showing the outline of two zones of differing EM conductivity. One zone delineates an area where conductivities exceed 20 millimhos/meter. This "high" conductivity area surrounds the entire site. The second zone delineates an area to the north of SRC where conductivities vary between approximately 16 and 20 millimhos/meter. Several "plume-like" features are also shown to extend from these two zones. The report concludes that the zone of high readings extending to the north and northeast of SRC and two linear features extending north and northeast indicate the migration of chemicals from SRC.

The E&E (1982) EM conductivity data is presented in the form of a map of the northeast corner and perimeter of the site showing the location of conductivity data points. Several contours delineating areas of equal conductivity are also shown on the map. The report concludes that the conductivity data indicates an area of high conductivity which is centered on the northeastern triangular-shaped portion of the site and that the high conductivities observed in that area reflect the migration of chemicals from SRC.

Our assessment of the result of the conductivity surveys indicates that they are not related to the actual presence of chemicals in the ground water and soils at the site. EM conductivity surveys can be a useful tool in delineating the horizontal and vertical extent of geologic deposits. The resolution of this remote sensing technique is relatively low unless the properties of the subsurface materials are significantly different. In most cases where the technique has been successful, its success stems from being able to define zones of materials which favor the accumulation or transfer of chemicals rather than from its ability to distinguish the actual presence of the chemicals. The physical properties of the geologic media generally override the slight changes which may be induced by variations in its chemical make-up. This comment is particularly applicable in situations where the chemicals may be present in very low concentrations. The limitations of the technique are acknowledged by ESE in their report since they indicate that the primary objective of the geophysical survey was to determine "the presence and distribution of permeable pathways which permit the preferential flow of contaminated ground water" (ESE, 1982) and in later discussions of the results of the conductivity survey also indicate that "it was unknown whether these four lobes were natural features or ground water contamination" (ESE, 1982). The report further acknowledges the need for assessing the presence of chemicals in the high conductivity zones through sampling and analyses.

Canonie's evaluation of the analytical data is that it has failed to disclose the presence of significant concentrations of chemicals in the ground water and soils at the site, or any obvious association between the sporadic occurrences of chemicals above detection limits and the extent of the high conductivity zones. Based on the preceeding observations, our

opinion is that the occurrence of the high conductivity zones is related to natural variations in the properties of the subsurface sediments, or alternately, due to the influence of the cultural features in the vicinity of SRC and/or the drums stored at the site.

3.3.2 Lower Aquifer

The analytical data for the deep aquifer includes the results of sampling and testing conducted during the ESE (1982) investigation and analyses of samples obtained by the Indiana Board of Health (1981) on July 9-10, 1981.

The Indiana Board of Health analyses identified the presence of low levels of phenol in samples obtained from Wells 7 and 8 (9 and <5 µg/l respectively). The ESE analyses report the occurrence of 8 volatile organic compounds and 7 inorganic compounds in five samples from the deep wells installed during the ESE investigation, and one blank (control) sample. In most cases the organic compounds that were identified occurred at trace levels below the 10 µg/l detection limit of the analytical equipment (out of 16 reported occurrences, 10 were reported as trace). The organic compounds reported to occur at levels above detection limits include methylene chloride (3 occurrences varying between 12 and 30 µg/l), phenol, (1 occurrence, at 43 µg/l), bis(2-ethylhexyl) phthalate, (1 occurrence at 30 µg/l), and di-n-butyl phthalate (1 occurrence at 39 µg/l). Of the total of eight organic compounds that were identified with certainty, 4 compounds appear for the first time and were not reported to occur in the samples from the shallow aquifer. The only reported inorganic compounds of consequence include arsenic (2 occurrences at 10 µg/l), cadmium (2 occurrences at 10 and 15 µg/l), chromium (1 occurrence at 30 µg/l), and lead (1 occurrence at 120 µg/l). Arsenic and lead were not reported to occur in any of the shallow aquifer samples. In most cases, the occurrences of the compound which were identified with certainty are sporadic and do not show any definable pattern of distribution from well location to well location.

Our review of the analytical data indicates that there is no significant evidence of the migration of chemicals from SRC into the deep aquifer. Our conclusion is based upon the following considerations:

- Most of the organic compounds identified with certainty occur at trace levels below the detection limits of the analytical equipment. At these levels, the variations introduced by sampling and analytical techniques are significant and diminish the validity of the determinations.

- Methylene chloride is the most frequent organic compound identified with certainty. One of the occurrences of this compound was reported for the blank (control) sample. As discussed in the

previous section, the occurrence of methylene chloride is not significant since it is relatively common and appears to be related to sampling analytical techniques.

- The remaining three organic compounds reported to occur at levels above detection limits were identified in the samples for Wells 140 and 145 only. These organic compounds were not identified as present in any of the shallow aquifer samples. The presence of organic compounds in the lower aquifer would presumably be ascribed to migration from the upper aquifer. Since these compounds are not present in the shallow aquifer, their occurrence in the lower aquifer must be ascribed to a source other than SRC. Alternatively, the sporadic occurrence of these compounds may also reflect sampling or analytical techniques.

- The inorganic analyses identify the presence of four significant metals. Two of these, arsenic and lead, were not reported to occur in the shallow aquifer samples. Accordingly, if they exist, their occurrence in the lower aquifer must be ascribed to a source other than SRC or sampling and/or analytical techniques. The remaining two metals, cadmium and chromium, occur at low levels in only two of the samples. The isolated nature and low level of these occurrences suggest that they are not of significance and may be due to sampling or analytical techniques.

4.0 REMEDIAL PLAN

4.1 Evaluation of Requirements and Proposed Remedial Actions

Canonie's evaluation of the extent of migration of chemicals from SRC indicates that there has been no significant movement of chemicals from the site and no apparent degradation of the existing ground water supply sources. However, the continued storage of chemicals at the site increases the potential for such migration since the present storage conditions do not provide adequate protection to stop the deterioration of the drums or the migration of chemicals which may be released from the containers as they deteriorate. The potential risks posed by the stored chemicals warrant the implementation of a remedial effort to remove all potential sources of chemicals and to provide adequate safeguards and assurances that the remedial actions have effectively removed further threats to the environment and to human health and safety. Canonie's work plan is based on the preceeding considerations and our assessment of site conditions and incorporates various remedial actions addressing surface and subsurface issues.

The major remedial actions which should be undertaken as part of the proposed plan are as follows:

- Redrilling and sealing of the existing on-site wells and sealing of all underground pipes leaving or entering the site.
- Removal of all drums, tanks, existing site structures and buildings and the top one foot of surface soil.
- Transportation and disposal of the removed materials.
- Filling and regrading of the site.
- Placement of a one-foot thick clay cap over the entire site. The cap should be seeded after placement.
- Installation of additional ground water monitoring wells.
- Monitoring of ground water over a five year period following construction.
- Design of a contingency water supply system entailing the extension of city water lines to Snyde Acres.

The following sections of this report provide detailed discussions of the various elements of the proposed remedial plan.

4.2 Surface Actions

4.2.1 Remedial Plan Elements

Our preliminary assessment of the remedial actions addressing surface concerns indicates that they will progress through four major phases. The following summaries provide brief descriptions of the work requirements for each phase.

4.2.1.1 Phase I, Mobilization and Site Preparation

The initial activities will consist of improvements to the site and the mobilization of all required equipment. The site improvements should include on-site roadway improvements, the preparation of staging and holding areas, the redrilling and sealing of existing on-site wells, and the sealing of all underground pipes entering or leaving the site.

Improvements to the on-site roadways and work areas will be required due to the existing ponding conditions which affect the mobility of the personnel and equipment conducting the various remedial operations and to ensure that the on-site equipment used to transfer the chemical containers is segregated from off-site equipment. The improvements which may be required will include segregated roads for transfer and loading, staging areas, holding areas, and shipping pads.

Prior to beginning drum or waste transfer operations, the existing wells should be redrilled and sealed with cement. We believe that this is necessary to eliminate the potential for migration of chemicals into the underlying aquifer resulting from spills occurring during the transfer operations or as a result of site disturbance. The well sealing activities should also be accompanied by sealing of all underground pipes which enter or leave the site. The pipes provide a potential path for the migration of chemicals off-site.

The remedial operations will require support equipment and facilities which will be mobilized during this phase. The equipment and facilities will include all construction and drum handling equipment necessary for the transfer, sampling, preparation, and loading of drums and tanks, field offices, laboratory facilities, health and safety facilities, and perimeter air monitoring equipment.

The health and safety facilities that may be required include changing rooms, showers, eating area(s) and laundry. In addition, an air quality monitoring system should be installed at the periphery of the site to ensure that emissions of vapors into the air are adequately controlled. Vapor emissions from the site can be adequately monitored with four strategically placed Organic Vapor Analyzers (OVA's). Three OVA's should be placed in the predominant downwind direction and one OVA should be placed

in the predominant upwind direction. In addition to the perimeter OVA's, air monitoring equipment should also be provided at the drum opening and waste sampling operations.

4.2.1.2 Phase II, Waste Handling and Disposal

During this phase, the chemicals stored in the tanks and drums will be sampled, characterized, batched, manifested, and transported for disposal. Based on our assessment of the site and past experience with similar remedial efforts, we have formulated a work plan which will lead to the segregation of the wastes into groups of compatible materials. After their characterization, these materials will be taken to commercial off-site disposal facilities. The proposed procedures serve as the basis for implementing the actual operations and may be modified as required by waste characteristics or to accomodate actual field conditions. The procedures which will be required to segregate the drummed wastes are illustrated on the attached Flow Chart 1, titled "Drum Segregation and Waste Typing" (Appendix A).

Drum handling should be undertaken using articulated and non-articulated forklifts modified to work in tight quarters and capable of removing drums from stacks or on the ground. The forklifts should be fitted with pressurized, self-contained cabs, providing breathing air to the operator from a compressed air tank, thus eliminating the need for a face mask which limits visibility and creates an accident hazard. Each cab should also be fitted with a self-contained breathing apparatus for use if the air supply fails or the operator needs to leave the cab.

Individual drums will be brought to one of several preliminary characterization areas for processing. The processing area should contain a number of work stations designed to separate operating personnel from mobile site equipment. In addition, the work stations minimize personnel movement and permit them to work under positive air pressure while conducting the preliminary characterization of wastes. The forklifts will convey the drums to Station 1 where each drum should be identified with a sprayed-on inventory control number. The drum should then be opened using a hydraulic bung remover or be pierced by a non-sparking point. Concurrently, a one pint sample jar will be numbered with the same inventory control number on the drum and will be attached to it.

The drum will then proceed to Station 2 where a one pint sample will be removed. The sample should then be immediately transferred to the field characterization lab where it will be examined for pH and flammability. Flammable and non-flammable materials should be tested separately to determine batch compatability. The sample from the combustible and non-combustible compatability tester will then be sent to the on-site analytical lab for batch testing. The details of the waste characterization

procedures are discussed in Section 4.2.2, Waste Characterization Methods and Procedures.

As the wastes are characterized, the drums will progress to Station 3 where they will be color coded and sealed, or covered, before transfer to one of six major segregation areas for batching and shipping. Specific segregation areas should be established for each classification of waste and should include

- o Acids
- o Corrosives
- o Flammable liquids
- o Non-Flammable liquids
- o Solids
- o Special handling including oxidizers, oils, and water reactives

Materials in each of these areas should then be batched or bulked (in the case of flammables), treated if required, manifested, and transported for incineration, treatment, or land disposal.

A significant number of bulk storage tanks are present at the site. The currently available information indicates that all liquids have already been removed from the tanks and that they currently contain undetermined volumes of sludges and solids. The wastes contained in the tanks should first be sampled, screened, and characterized according to the same procedures used for the drummed wastes. Depending upon the results of the initial characterization and the phase composition of the wastes they may be manifested and transported for disposal in their present containers or may be transferred into drums. Tanks which are emptied of their contents should be cleaned by washing and rinsing as appropriate. The waste streams generated from the tank cleaning operations should be drummed, characterized, and disposed of with the existing site drums. The cleaned tanks will require sampling and testing in order to define residual contaminant levels. Depending upon the character and level of residual contaminants, the tanks may be disposed whole or may be dismantled prior to disposal.

All site work should be performed under a strict, site specific, health and safety program. Pre and post employment physicals should be required of all personnel at the site. The ultimate form of personal protection will depend upon personnel monitoring for significant compounds present at the site. Initial construction work should be undertaken using airline respirators or positive supplemental air pressure for employees in the forklift cabs or specially designed work stations. The airline equipment may be supplanted by carbon respirators if analytical data supports their use. All employees should work in full safety garb including, at a minimum, Tyvec coveralls, rubber, steel-toed safety boots, impervious glasses, and hard hats. Emergency eye wash and safety showers should be provided at the site. It is anticipated that all employees will be required to change from their street clothes upon arriving at the site and will be required to leave all site clothes at the site at the close of the workday. Shower

facilities should be provided at the site. No smoking or eating should be permitted within the confines of the workplace. Full health and safety protocols should be supplied to the applicable regulatory agencies before work commences.

All wastes and debris should be transported and disposed of at off-site facilities. The disposal destination of the wastes will depend upon whether they are liquid or solid and the character of the waste stream. Whenever applicable, flammable liquids should be incinerated or recycled. Non-flammable liquids may be recycled, stabilized, or treated prior to disposal. Solid wastes and the debris from the dismantled facilities should be disposed at an approved landfill. The disposition of non-flammable liquids, highly toxic materials or wastes requiring special handling and not accepted in their present state by the disposal facilities will have to be determined on a case by case basis. We expect that these materials may require additional treatment or preparation prior to disposal.

The remedial activities should incorporate a site specific quality assurance program to document and monitor analytical and engineering work, project record keeping, drum segregation and waste characterization records, air monitoring program, health and safety program, manifesting, transportation and disposal records, and cost tracking. The quality assurance program should incorporate a drum and waste tracking and inventory system documenting in full the waste handling and characterization tasks from the initial segregation through final disposition. We firmly believe that a comprehensive quality assurance program is required to reduce the potential for errors, furnish documentation as to the work performed, and to serve as a compliance review vehicle ensuring adherence to regulatory agency requirements.

4.2.1.3 Phase III, Dismantling of Structures and Soil Removal

Following the removal of the drums and the bulk storage containers, all existing site facilities including buildings, revetments, bunkers, and reprocessing equipment should be dismantled. The dismantled debris, as well as any other large, solid debris present at the site, will be transported to an approved landfill.

The dismantling operation should be concluded by removing the top foot of surficial materials at the site including natural soil and fill imported for site improvements. The surficial materials should be removed throughout the entire site, including the triangular-shaped area at the northeast corner of SRC.

Disposal of these material will require sampling and testing of the soils to determine the character of leachates generated according to the EP toxicity test procedure. The testing program should consist of approximately

five tests per acre. All of the testing work may be conducted at the on-site laboratory. After characterization, the excavated materials should be transported to and disposed of at an approved landfill facility.

4.2.1.4 Phase IV, Site Closure

The activities during this phase should include the replacement of the soils excavated during the preceeding phase, filling and grading of the triangular area at the northeast corner of SRC, leveling of the existing perimeter berms, and capping of the entire site including the triangular-shaped area with one foot of compacted clay.

The removal of the surficial materials will lower the grade throughout the site by one foot below the surrounding grade. This condition will create the potential for ponding of surface runoff due to direct precipitation or drainage from surrounding areas into the site. Accordingly, the removed materials will have to be replaced with an equal volume of imported fill. In addition, the northeastern triangular portion of the site is, at the present, below general grade. This area should also be filled and graded to conform to the surrounding grade in order to prevent ponding of surface runoff.

The existing perimeter berms are responsible for the ponding of water at the site and increase the potential for movement of chemicals into the underlying aquifer. The increase in migration potential is due to an increase in hydrostatic head due to standing water, longer contact time of surface runoff with the surface soils and an increase in the total volume of water percolating through the soils. Removal of the berm will eliminate the ponding problem. Accordingly, the berm should be leveled and graded to conform to the general site grade.

The last element of this phase should include the placement of a one-foot thick clay cap over the entire site including the triangular-shaped area in the northeast portion of the site. The excavation of the top one-foot of surface soils during Phase III will effectively remove the bulk of any chemicals which may be present in the soils due to past operations or as a result of spills during the waste removal effort. The existing data indicates that there has been no significant migration of chemicals into the soils at the northeastern portion of the site. We expect that a similar situation exists in the remaining portions of the site due to the impervious nature of the surface soils (as evidenced by the extensive ponding of surface runoff). Placement of the cap will provide an additional measure of safety against the migration of chemicals which may be present in very low concentrations below the one-foot of excavated surface soils since it will act as a seal preventing the infiltration of rainfall. The total amount of rainfall or surface runoff infiltrating through the surface soils is expected to be very low. However, it does represent the only

transfer mechanism with the potential to effect the migration of residual chemicals. Accordingly, the provision of a clay cap will insure that this potential transfer mechanism is effectively eliminated. In addition, the clay cap will be graded and seeded so as to reduce erosion and to provide drainage for precipitation falling directly onto the site or drainage coming across the site. These measures will ensure that ponding does not occur and will further reduce the potential for infiltration. Following seeding, the site should be fenced to preclude unauthorized entry and use of the area.

We believe that implementation of the above site closure measures will effectively mitigate the migration of residual chemicals from the site after the wastes are removed. In addition, the use of a clay cap as an acceptable closure method has ample precedent in satisfying the site closure requirements of regulatory agencies.

4.2.2 Waste Characterization Methods and Procedures

Characterization of the wastes will be required to ensure the safety of personnel and equipment during the waste transfer operations, to provide the data necessary to identify the appropriate method of disposal, to satisfy the requirements of the disposal facilities, and to comply with manifesting requirements. Complete laboratory analyses of the wastes on a drum by drum basis will be more costly than the actual removal and transportation costs and, in our opinion, is not required. We believe that the wastes can be safely and effectively handled and disposed through a waste characterization procedure which is based on the assumption that all materials originating from the site will be either incinerated, if they are combustible liquids, or otherwise will be disposed at a secure landfill. Under this operating philosophy the contents of each drum will be screened to define basic characteristics affecting their safe handling and disposal. Following this initial screening the drums will be assigned to "batches" of drums containing wastes of similar character and a complete laboratory analysis will be performed on a composite sample of the drums in a particular batch. We believe that a maximum batch size of 75 drums will optimize the operations and will result in an adequate characterization of wastes.

The batch characterization process will require detailed laboratory analyses of a composite sample of the batch to manifest each truckload of material leaving the site. Each batch will entail the manifesting of approximately 75 drums or 4,125 gallons. Based on the envisioned batch size, a minimum of 800 detailed analyses will be required. These analyses will be expedited by providing an on-site laboratory with the capability to conduct the required waste analyses and the analyses required for personnel and environmental monitoring. The laboratory should be equipped with atomic adsorption and gas chromotography capabilities. Any mass spectroscopy required to verify the on-site analyses out be conducted at an off-site laboratory.

The general aspects of a proposed segregation procedure are illustrated on the attached Flow Chart 2, titled "Waste Characterization" (Appendix A). Under this procedure, the characterization of the wastes will proceed as follows:

- The initial segregation should be made based on the phase (whether a solid or liquid) characteristics of the waste. Viscous or sludge-like wastes should undergo the "liquids" screening procedure. Drums containing liquid and solid phases should be decanted and the individual phases should be analyzed separately.

- Solids should be tested for their reactivity to water and acid and caustic solutions. Following the initial characterization, the wastes should be analyzed in the laboratory either as individual drums or, where applicable, as a batch.

- Liquid wastes with a pH above 12 should be segregated and analyzed for cyanides and sulfides. After laboratory analyses, the wastes may be disposed as corrosives.

- Liquid wastes with a pH below 2 should be segregated as acids and analyzed for chlorides, fluorides, and nitrates. After laboratory analyses the wastes may be neutralized as required and disposed.

- Wastes in lined drums should be segregated and checked as oxidizers and for reactivity with water. If the materials are oxidizers or reactive, they should be assigned to a special category. Following laboratory analyses they may be assigned for disposal.

- Wastes appearing to be oils should be batched and analyzed for PCB's. Upon completion of the laboratory analyses, the wastes may be assigned for disposal.

- Wastes with pH values between 2 and 12 should first be screened as combustible or non-combustible wastes based on their ability to support combustion when exposed to a propane flame.

- Combustible and non-combustible wastes should be treated as separate streams but may be characterized in the same manner. Compatibility and water reactivity of batches of waste may be tested on each waste stream by placing samples of material from a batch of drums into a small pressure vessel equipped with thermal and pressure sensing equipment and mixing. A rise in temperature or pressure indicates non-compatibility of the materials and the source drum(s) should be removed from the batch for further analysis. Following compatibility testing, the composite (batch) sample in the pressure vessel should be analyzed for PCB's, chlorinated pesticides and solvents, cyanides, and sulfides. The batch may then be manifested and transported for incineration or land disposal as appropriate.

The proposed segregation and characterization processes are very similar to the procedures used at other sites and have been previously reviewed and approved by federal and state regulatory agencies. Thus, they provide an established precedent for adopting the same approach at SRC.

4.3 Subsurface Actions

Canonie's evaluations of the existing subsurface data indicates that there has been no significant migration of chemicals from SRC and consequently no apparent adverse impact on the quality of ground water supplies. Accordingly, the present conditions do not warrant the initiation of any specific subsurface remedial program beyond the sealing of the on-site wells and the underground pipes leaving and entering the site, removal of the surface soils, and placement of an impervious cap. These measures will eliminate the only potential sources of chemicals from the site.

The removal of the surface soils and placement of the impervious cap are dual purpose actions addressing both surface and subsurface concerns. Excavation of the surface soils will remove the bulk of any chemicals which may be present at the site and may migrate from SRC following the completion of the remedial effort. The emplacement of a compacted clay cap will ensure that any chemicals which may remain at the trace levels in the sediments below the excavated surface soils are not mobilized through leaching. Similarly, the sealing of the on-site wells and the underground pipes will ensure that these potential pathways for the migration of chemicals during and after construction are eliminated.

Ground water serves as the water supply for a large number of domestic and industrial wells. The remedial effort must also provide reasonable assurances and a means to ascertain that chemical migration does not occur following the completion of the remedial work. In addition, some provisions should be made to ensure that an alternate source of water supply is available in the event of a contingency. Based on these considerations, we believe that the program of surface action should include the installation of additional observation wells, monitoring of ground water and air following completion of the remedial work, and the design of an alternate water supply system for the residents of Snyde Acres.

The existing network of observation wells, which were installed during the various U.S. EPA studies, constitutes a warning system allowing for the early detection of any chemicals migrating from the site. Assuming an aquifer flow rate of 2 feet per day (the KVA report indicates a flow rate of 1.2 feet per day and the ESE report indicates a flow rate of 0.82 feet per day), approximately 3.5 years will elapse before any chemicals passing through the observation well network reach Snyde Acres. This length of time is based on a conservative assumption and is more than adequate to identify and confirm the presence of the chemicals and to initiate remedial or contingency efforts.

Our evaluation of the existing observation wells network indicates that additional wells may be required to provide adequate coverage for shallow and deep aquifers. Specifically, additional wells should be installed to monitor the full thickness of the shallow aquifer; to provide additional monitoring points immediately to the north of the east-west stream and immediately to the west of the drainage ditch located from the north site boundary; to document the degree of hydraulic connection between the shallow and deep aquifers north of the site; to monitor the shallow and deep aquifer to the east of the site, between SRC and the airport supply well; and to monitor the deep aquifer to the west and south of the site. We estimate that 10 additional shallow aquifer wells and 10 additional deep aquifer wells will be required to provide the required coverage. In order to ensure that the remedial work activities have not allowed for the migration of chemicals from the site, 5 shallow wells and 5 deep wells should be selected from the network of existing and additional wells for monitoring over a period of 5 years following completion of the remedial work. One shallow well and one deep well should be located upgradient of the site. Samples should be analyzed for significant organic and inorganic chemicals. A detailed sampling and testing protocol should be developed and submitted for approval to regulatory agencies prior to implementation. The frequency of sampling may be diminished over time and should be discontinued after 5 years if the results of the monitoring program indicates no net out-migration of chemicals from the site. During the first year, the selected wells should be monitored on a monthly basis. Sampling should be switched to a quarterly basis during the second year and into a bi-yearly basis during the third year. During the fourth and fifth years, wells should be sampled annually. If replicate analyses indicate a consistent rising trend in any of the monitored chemicals, the frequency of sampling of the affected wells should be increased to that of the preceeding periods.

In view of the nature of the ground water quality issue and in order to provide positive assurances that human health and safety is adequately protected in the event of a contingency, remedial actions should also include the complete design of an alternate water supply system for Snyde Acres. We believe that the most practical and cost effective alternate water supply system will consist of the extension of the city of Seymour's water supply lines to Snyde Acres. The design of the alternate water supply extension should be completed before the start of remedial work and will entail the preparation of complete plans and specifications and a bid package allowing for the immediate start of construction should a contingency arise.

5.0 COMPLIANCE OF REMEDIAL PLAN WITH U.S. EPA INTENDED ACTIONS

5.1 Actions Intended by U.S. EPA

The U.S. EPA has identified the actions it intends to pursue in a recently issued communication (United States Department of Justice, 1982). The course of action set by the U.S. EPA is subdivided into two major phases. The first phase, Phase A, addresses the "Surface Cleanup of Drums and Storage Tanks" and will progress through two stages before the implementation of any actual remedial work. The first stage consists of a feasibility study to determine sampling and testing procedures, a compatability testing protocol to identify and evaluate disposal alternatives, and the implementation of a community relations program. The second stage of the Phase I actions addresses the design of the remedial plan, including the development of detailed project specifications and a bid package, and the securing of technical support services during the contract solicitation stage. The U.S. EPA communication further states that the final bid package is to be completed by August 4, 1982.

The second phase, Phase B, addresses "Contaminated Soil and Ground Water" and will also be conducted in two stages, a feasibility study and a design effort. The feasibility study will consist of the evaluation of alternatives for remedial work including laboratory studies, the identification of a recommended remedial plan, and the development of a conceptual design. The design effort will consist of the preparation of plans and specifications and a bid package for the remedial program identified in the feasibility study as well as the preparation of start-up and operation plans (if required). The Phase II work will not be initiated until all drums and tanks have been removed from the site (the third stage of Phase I).

5.2 Compliance of Remedial Plan

Based on our review of the course of action intended by the U.S. EPA and its comparison to the elements of the remedial plan summarized in Section 4.0 of this report, we have concluded that the proposed plan fulfills the requirements of the Phase I, Feasibility Study and the Phase II, Feasibility Study. The design and preparation of specifications and bid documents to initiate the actions proposed in the remedial plan are not addressed in this report. However, based on the results of our evaluations, the preparation of these documents can be initiated immediately.

The Phase I Feasibility Study Requirements, as identified by the U.S. EPA, essentially address the identification of sampling and testing procedures which will permit the safe disposal of the wastes. These items have been evaluated in our investigation of the remedial requirements and are discussed in detail in Section 4.0. The proposed methods and procedures will

provide a complete characterization of the waste materials which will satisfy manifest requirements and will ensure that they can be safely handled and disposed by incineration or secure landfilling. In view of the variety of materials which may be present at the site, additional evaluations of disposal alternatives are not cost effective since an inordinate effort will be required to evaluate disposal alternatives for relatively small volumes of a large variety of wastes.

The proposed subsurface actions (Section 4.3) fully address the remedial work which is required and has been identified through the various studies conducted by the U.S. EPA. The available data clearly indicates that no significant subsurface migration of chemicals has occurred. The proposed excavation of the top one-foot of surficial soils will remove chemicals which may be present at the surface. Any chemicals which may remain below this depth are expected to occur at trace concentrations and will be strongly adsorbed by the soil particles. The provision of a clay cap will insure that leaching processes are eliminated. In addition, at the expected trace levels, any chemicals which are mobilized through leaching will be highly diluted and will not significantly affect the quality of ground water.

As an additional measure of safety, the proposed remedial plan incorporates the installation of additional observation wells, the monitoring of selected observation wells in the shallow and deep aquifers over a 5-year period following construction, and the design of a contingency system of water supply. These measures will ensure that an adequate early warning system is in place and that an alternative source of water supply can be made available should a contingency arise.

The results of the studies conducted by the U.S. EPA do not show any significant chemical migration into the shallow or deep aquifers. In addition, the proposed ground water monitoring system and alternative water supply ensure that contingencies have been properly addressed. Accordingly, the proposed remedial actions ensure that adequate safeguards for the protection of human health and safety have been provided.

6.0 REFERENCES

1. Ecology and Environment, 1982, "Extent of Soil Contamination and Location of Buried Materials at the Seymour Recycling Facility Near Seymour, Indiana"; prepared for the U.S. Environmental Protection Agency.

2. Environmental Science and Engineering, 1982, "Groundwater Contamination Study, Seymour Recycling Center, Seymour, Indiana". Prepared for the U.S. Coast Guard, Second District, St. Louis, Missouri; and, the U.S. Environmental Protection Agency, Region V, Chicago, Illinois.

3. Gray, H.H., 1972 (Part A), "Geologic Map of the 1° x 2° Louisville Quadrangle, Indiana, Showing Bedrock and Unconsolidated Deposits"; Indiana Geological Survey, Department of Natural Resources, Bloomington, Indiana.

4. Gray, H.H., 1972 (Part B), "Geologic Map of the 1° x 2° Louisville Quadrangle, Indiana, Showing Bedrock and Unconsolidated Deposite"; Indiana Geological Survey, Department of Natural Resources, Bloomington, Indiana.

5. Indiana Board of Health, 1981, Unpublished Records of Water Quality Analyses. Indianapolis, Indiana.

6. Indiana Geological Survey, 1970, Bulletin 43 "Compendium of Rock-Unit Stratigraphy in Indiana"; Indiana Geological Survey, Department of Natural Resources, Bloomington, Indiana.

7. Indiana Geological Survey, 1981, "Bedrock Topography Map of the State of Indiana". Unpublished working map on file with Indiana Geological Survey, Department of Natural Resources, Bloomington, Indiana.

8. K. V. Associates, 1980, "Groundwater Survey, Seymour Hazardous Waste Site"; Prepared for the U.S. Environmental Protection Agency Emergency Spill Response Section, Region V, Chicago, Illinois.

9. O. H. Materials, 1980, "Final Report to U.S. EPA, Analytical Data, Seymour Recycling Center"; Prepared for the U. S. Environmental Protection Agency, Region V.

10. Soil Conservation Service, 1979, Letter to Mr. Robert Gatte (Jackson County Sanitarian) from Mr. Henry T. Horstman (District Conservationist).

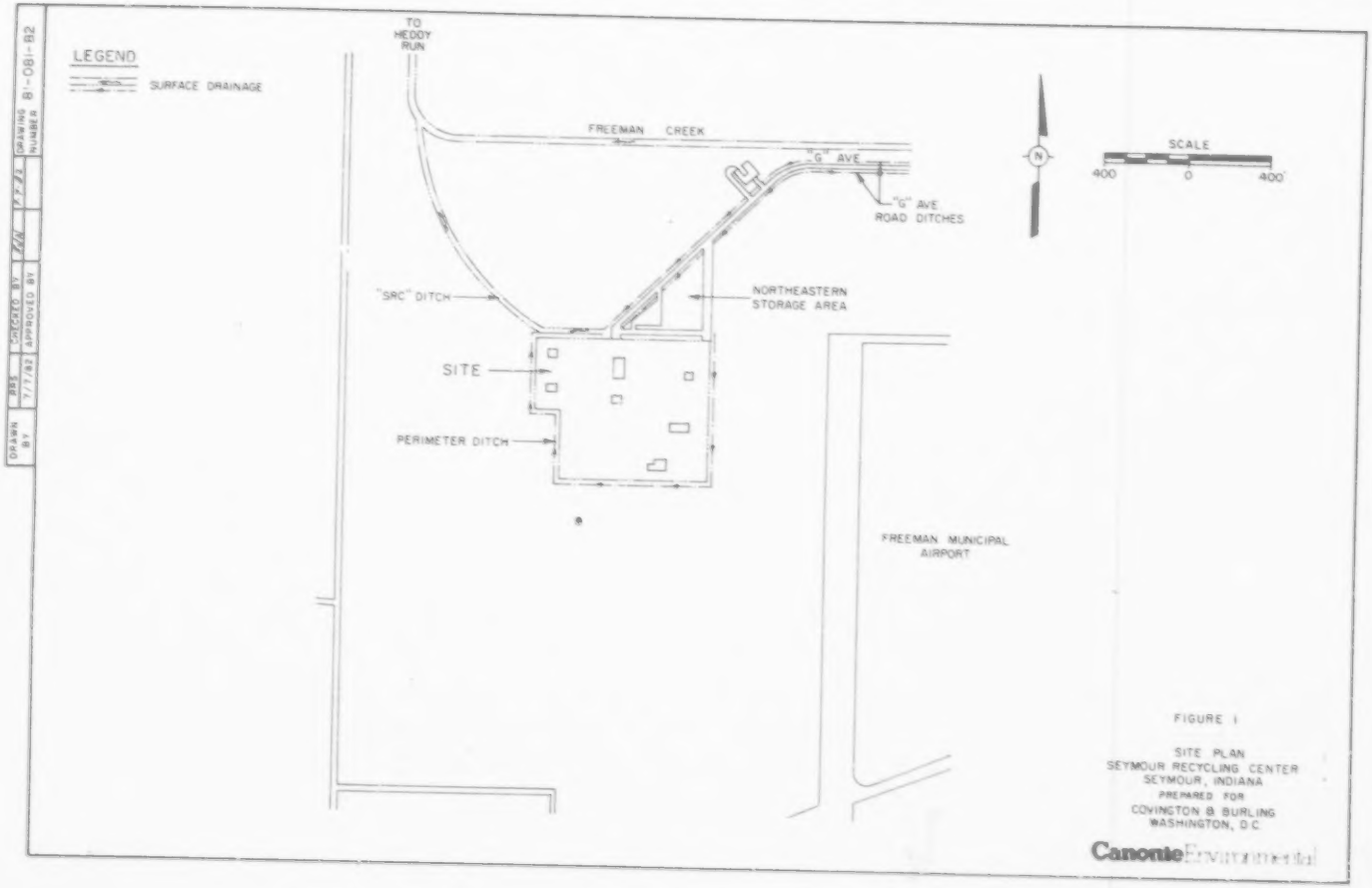
REFERENCES
(Continued)

11. Toledo Testing Laboratory, 1980, "Hydro-Geological Report, Seymour, Indiana"; Prepared for O.H. Materials Co., Findlay, Ohio.

12. United States Department of Justice, 1982, Letter Dated May 14, 1982, Prepared by Mr. Stephen D. Ramsey, Chief, Environmental Enforcement Section; and, Attachment Titled "Feasibility Study and Remedial Design, Seymour Recycling Corp., Seymour, Indiana", 14 pages.

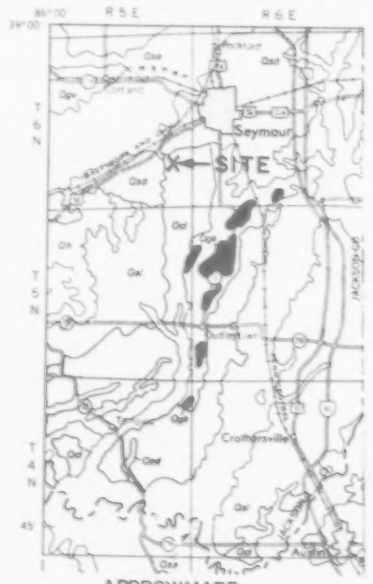
13. United States Fish and Wildlife Service, 1981 "Contaminants in Sediments and Fish in the Vicinity of Seymour Recycling Corporation, Seymour, Indiana; Prepared for the On-Scene Coordinator, Seymour Recycling Corporation, United States Environmental Protection Agency.

42-590 O—85——19


LEGEND
SURFACE DRAINAGE
TO HEDDY RUN
FREEMAN CREEK
"G" AVE
"G" AVE ROAD DITCHES
"SRC" DITCH
NORTHEASTERN STORAGE AREA
SITE
PERIMETER DITCH
FREEMAN MUNICIPAL AIRPORT
N
SCALE
400 0 400
DRAWN BY
DATE 7/7/82
CHECKED BY
APPROVED BY
DRAWING NUMBER 81-081-82
FIGURE 1
SITE PLAN
SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.
Canonie Environmental

DRAWN BY	MTM	CHECKED BY	RW-M	6-7-82	DRAWING NUMBER	81-081-A1
	8-12-81	APPROVED BY	RW-M	6-7-82		

SURFACE DEPOSITS



APPROXIMATE SCALE

0 6miles

GENERAL STRATIGRAPHY

LEGEND

Qal — Clay, silt, and sand
Lacustrine deposits. Lacustrine facies of Atherton Formation

Qal — Silt, clay, and sand
Lacustrine deposits and washed till. Lacustrine facies of Atherton Formation

Qax — Silt, sand, and gravel
Mostly alluvium, but includes some colluvial and pedi-fal deposits. Martinsville Formation

Qgv — Gravel, sand, and silt
Valley-train deposits. Outwash facies of Atherton Formation

Sand, silt, and some gravel
Ice-contact stratified drift, Kame and valley facies of Jessup Formation

Qad — Sand and some silt
Eolian sand Dune facies of Atherton Formation

Qa — Till
Includes some ice-contact stratified drift and areas of older till. Jessup Formation

NOTES

1. DATA FROM GRAY, 1972, PART B

FIGURE 2
SURFACE GEOLOGY
SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.

Canonie Environmental

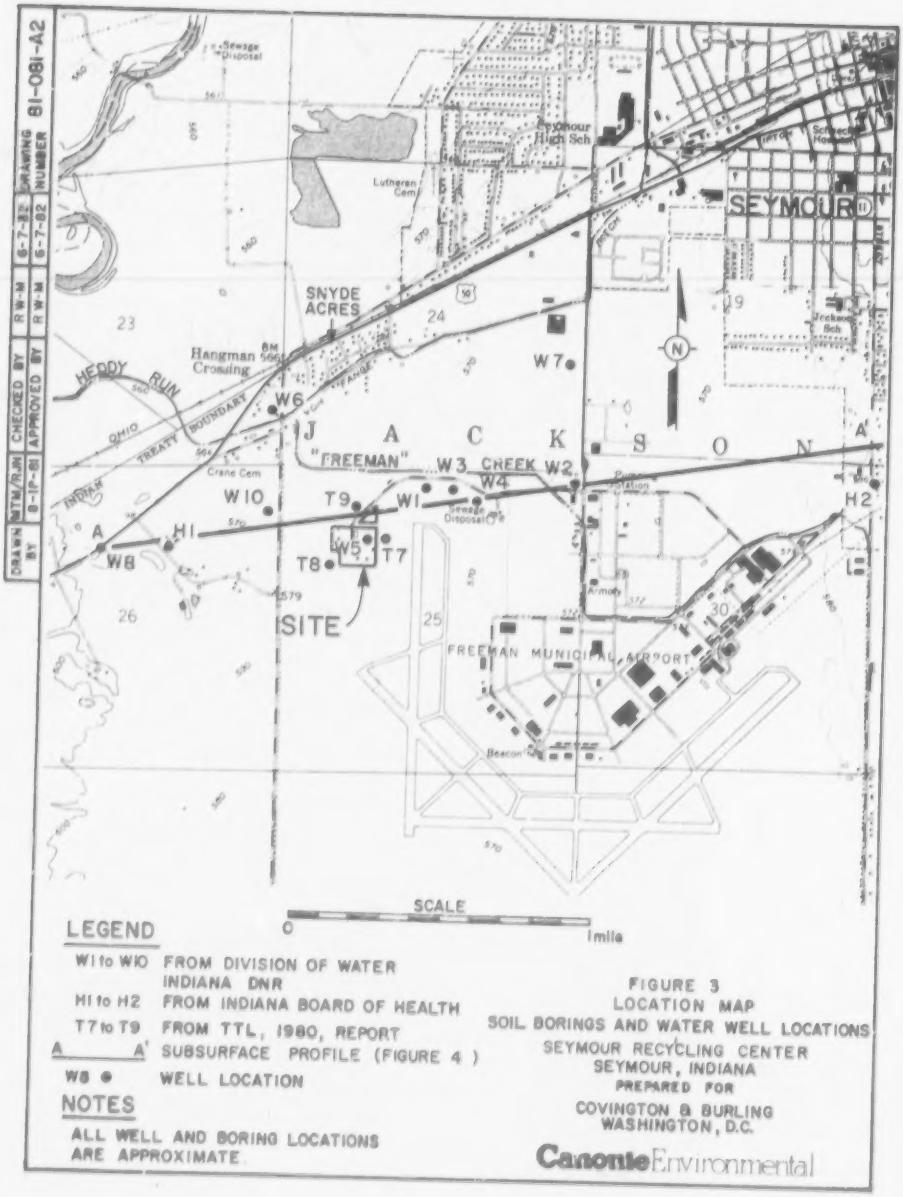
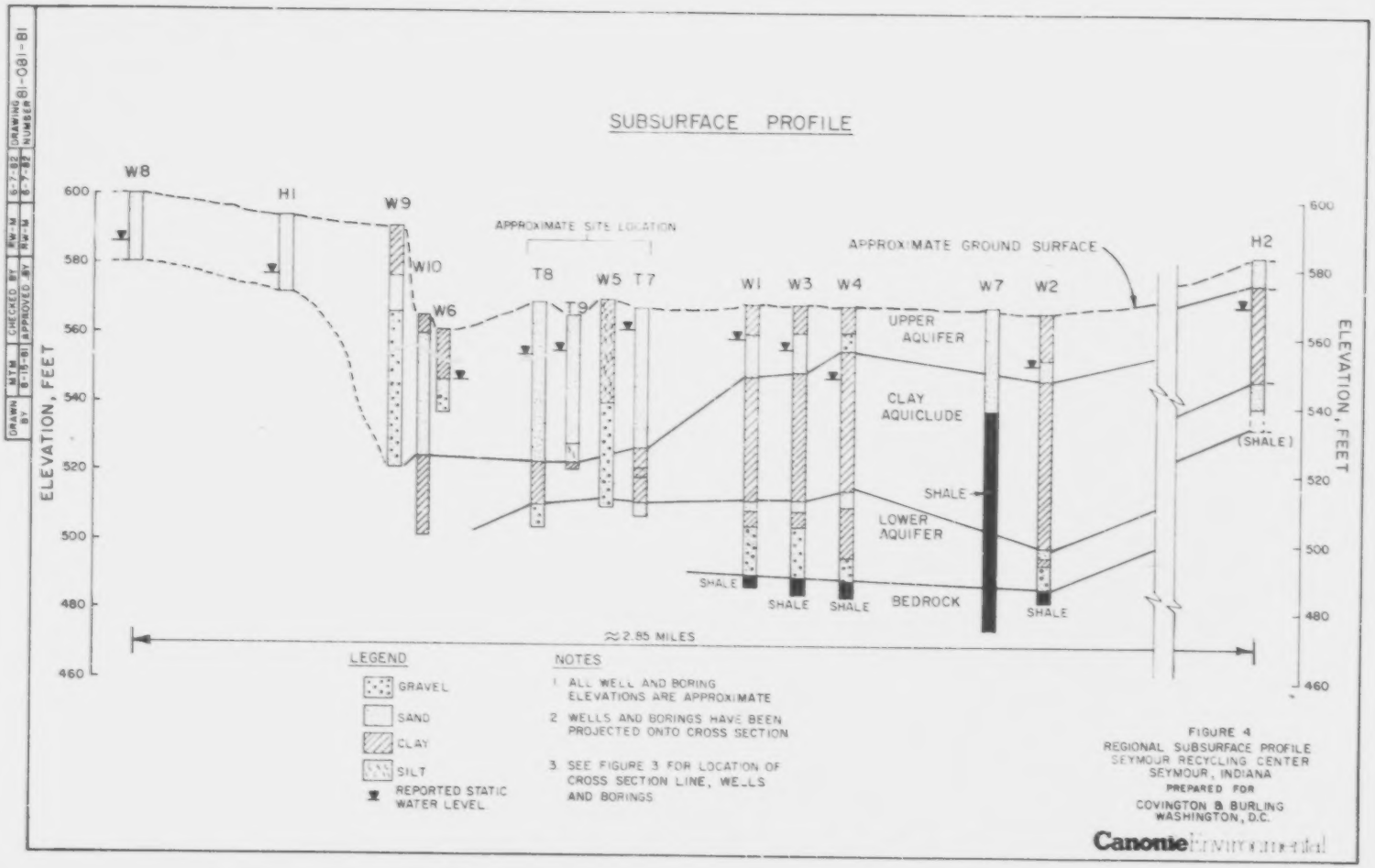


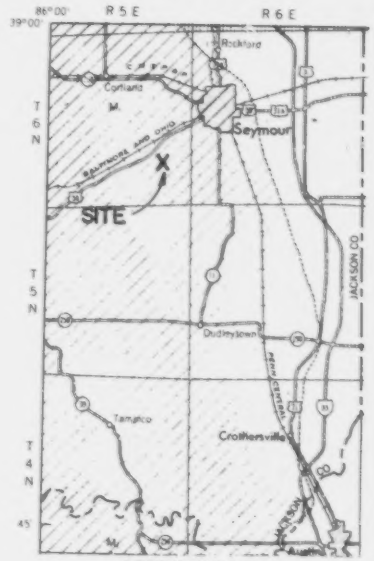
FIGURE 3
LOCATION MAP
SOIL BORINGS AND WATER WELL LOCATIONS
SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.

Canonie Environmental

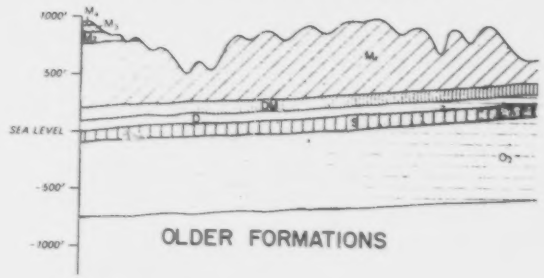

SUBSURFACE PROFILE
DRAWN BY MTM 8-19-81
CHECKED BY RW-M 8-7-82
APPROVED BY RW-M 8-7-82
DRAWING NUMBER 81-081-81
ELEVATION, FEET
600
580
560
540
520
500
480
460
W8
H1
W9
W10
W6
T8
T9
W5
T7
W1
W3
W4
W7
W2
H2
APPROXIMATE SITE LOCATION
APPROXIMATE GROUND SURFACE
UPPER AQUIFER
CLAY AQUICLUDE
LOWER AQUIFER
BEDROCK
SHALE
(SHALE)
≈2.85 MILES
LEGEND
GRAVEL
SAND
CLAY
SILT
REPORTED STATIC WATER LEVEL
NOTES
1. ALL WELL AND BORING ELEVATIONS ARE APPROXIMATE
2. WELLS AND BORINGS HAVE BEEN PROJECTED ONTO CROSS SECTION
3. SEE FIGURE 3 FOR LOCATION OF CROSS SECTION LINE, WELLS AND BORINGS
FIGURE 4
REGIONAL SUBSURFACE PROFILE
SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.
Canonie Environmental

DRAWN BY	MTM/RJN	CHECKED BY	RW-M	6-7-82	DRAWING NUMBER	81-081-A3
	6-12-81	APPROVED BY	RW-M	6-7-82		

BEDROCK DEPOSITS



GENERAL STRATIGRAPHY



LEGEND

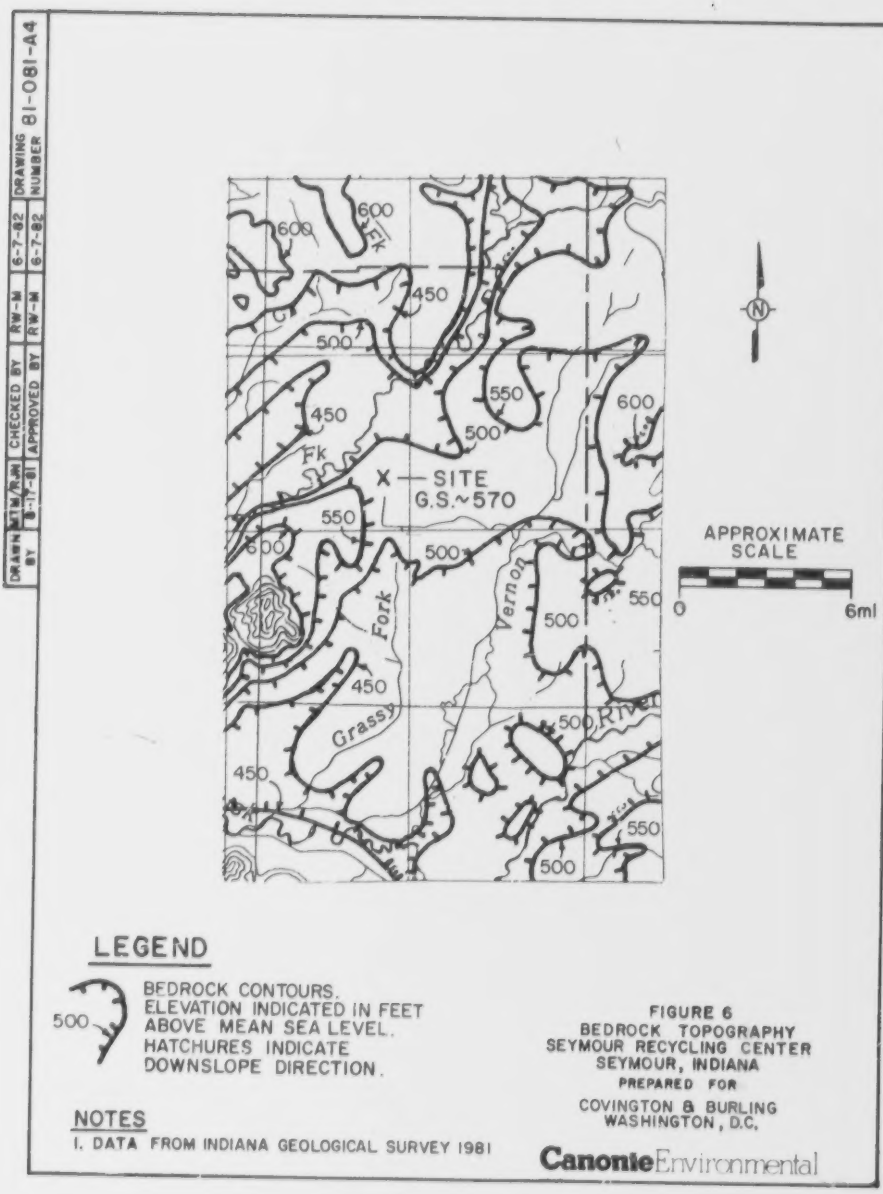
- West Baden Group — *Basal part only present. Semi-consolidated sand*
- Borden Group and Rockford Limestone — *Siltstone, shale, sandstone, and some limestone*
- Blue River Group — *Mostly limestone, some dolomite and chert*
- New Albany Shale — *Mostly black shale, some greenish-gray shale*
- Sanders Group — *Limestone, in part shaly and cherty*

NOTES

1. DATA FROM GRAY, 1972, PART A

FIGURE 5
BEDROCK GEOLOGY
SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.

Canonie Environmental


DRAWN BY KTM/RJM
8-17-81
CHECKED BY RW-M
APPROVED BY RW-M
6-7-82
6-7-82
DRAWING NUMBER 81-081-A4
600
600
Fk
450
500
550
600
450
500
Fk
X — SITE
G.S.~570
550
600
500
Vernon
Fork
550
500
450
Grassy
500
River
450
550
500
N
APPROXIMATE SCALE
0
6ml
LEGEND
500
BEDROCK CONTOURS. ELEVATION INDICATED IN FEET ABOVE MEAN SEA LEVEL. HATCHURES INDICATE DOWNSLOPE DIRECTION.
NOTES
1. DATA FROM INDIANA GEOLOGICAL SURVEY 1981
FIGURE 6
BEDROCK TOPOGRAPHY
SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.
CanonieEnvironmental

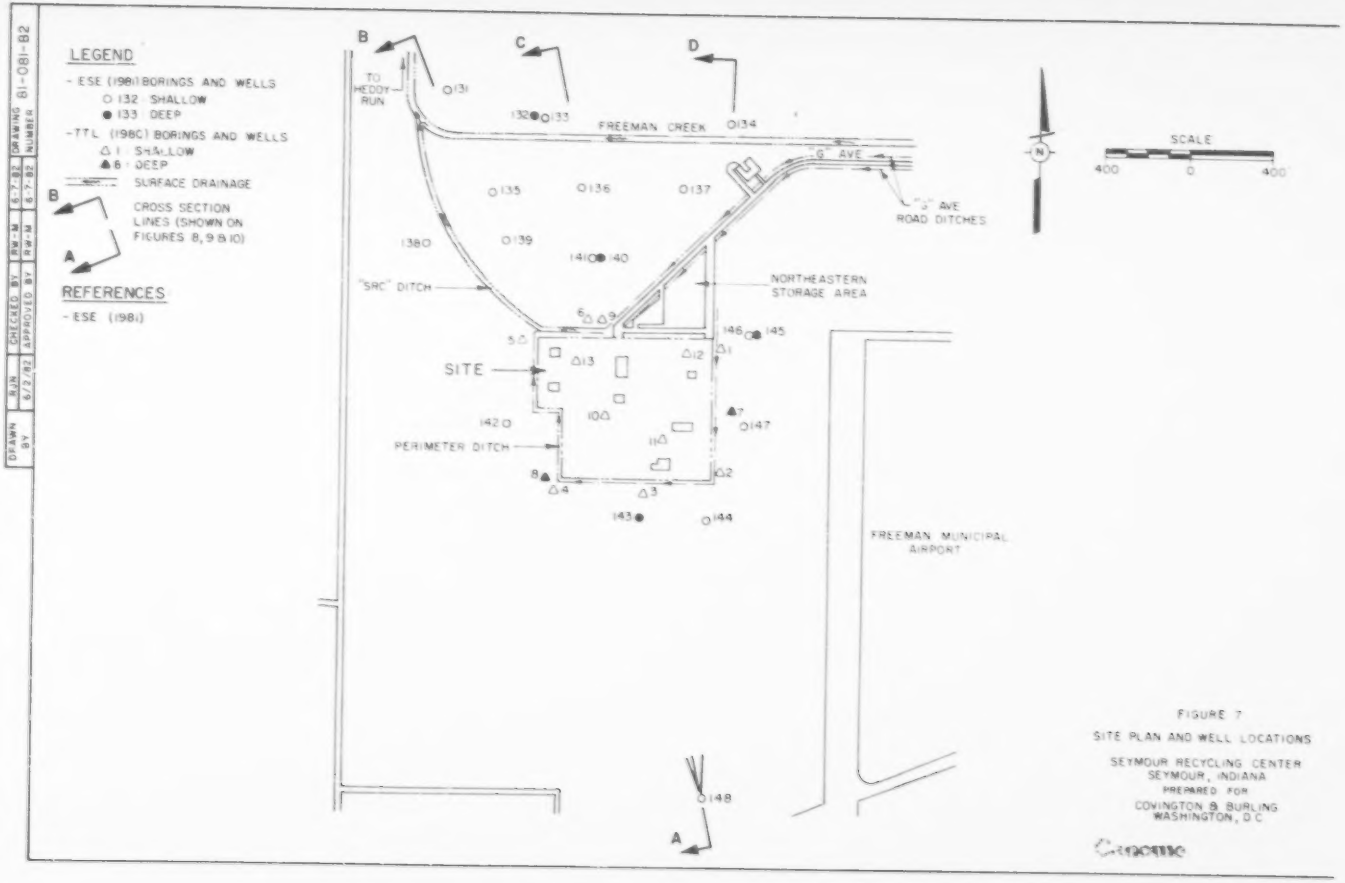
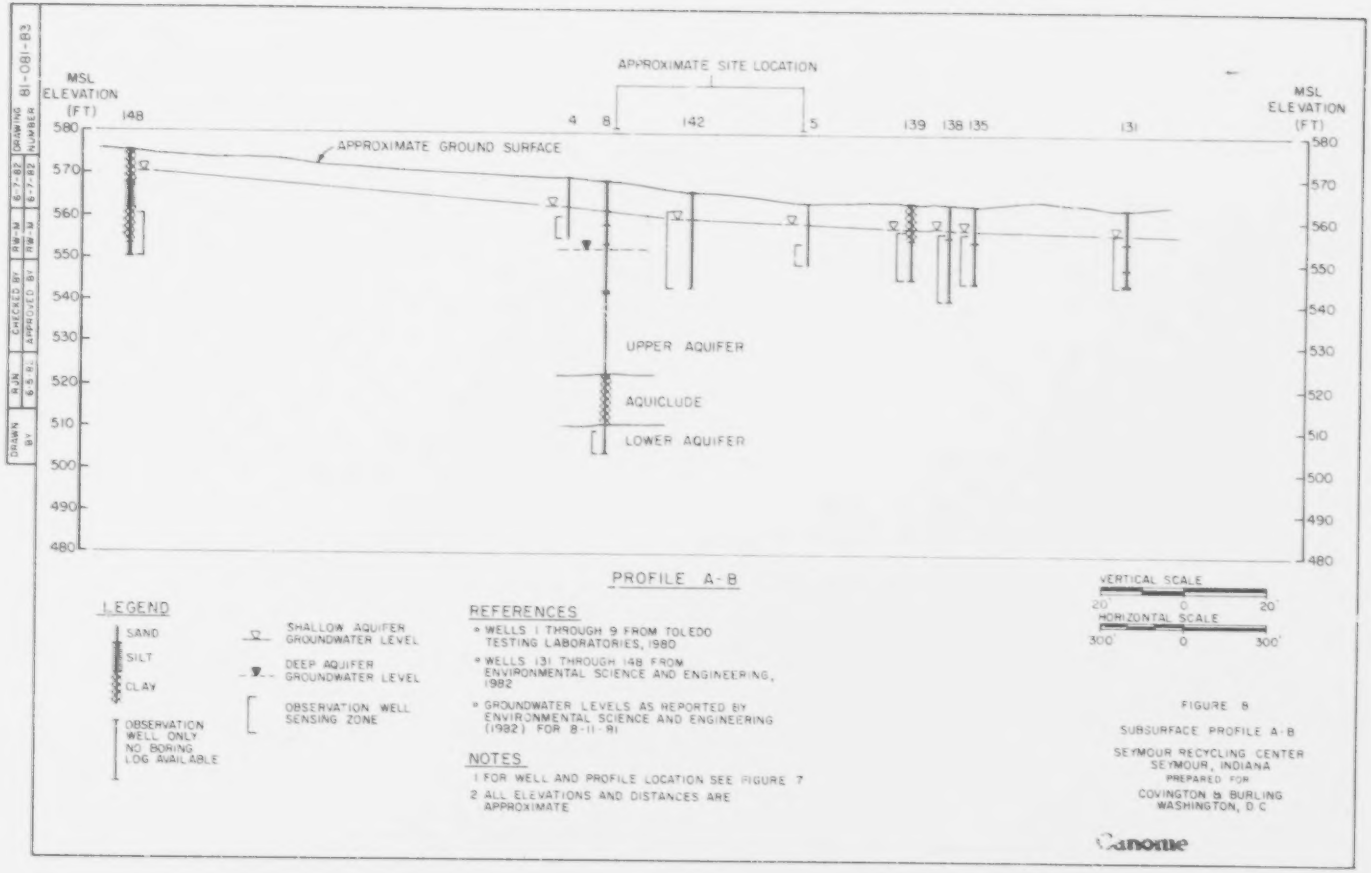


FIGURE 7

SITE PLAN AND WELL LOCATIONS

SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.


DRAWN BY
A.J.N. 6-5-82
CHECKED BY
APPROVED BY
R.W.M. 6-7-82
R.W.M. 6-7-82
DRAWING NUMBER
81-081-B3
MSL ELEVATION (FT)
APPROXIMATE SITE LOCATION
148
4
8
142
5
139
138
135
131
APPROXIMATE GROUND SURFACE
UPPER AQUIFER
AQUICLUDE
LOWER AQUIFER
580
570
560
550
540
530
520
510
500
490
480
PROFILE A-B
LEGEND
SAND
SILT
CLAY
OBSERVATION WELL ONLY NO BORING LOG AVAILABLE
SHALLOW AQUIFER GROUNDWATER LEVEL
DEEP AQUIFER GROUNDWATER LEVEL
OBSERVATION WELL SENSING ZONE
REFERENCES
* WELLS 1 THROUGH 9 FROM TOLEDO TESTING LABORATORIES, 1980
* WELLS 131 THROUGH 148 FROM ENVIRONMENTAL SCIENCE AND ENGINEERING, 1982
* GROUNDWATER LEVELS AS REPORTED BY ENVIRONMENTAL SCIENCE AND ENGINEERING (1982) FOR 8-11-81
NOTES
1 FOR WELL AND PROFILE LOCATION SEE FIGURE 7
2 ALL ELEVATIONS AND DISTANCES ARE APPROXIMATE
VERTICAL SCALE
20' 0 20'
HORIZONTAL SCALE
300' 0 300'
FIGURE 8
SUBSURFACE PROFILE A-B
SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.
Canonie

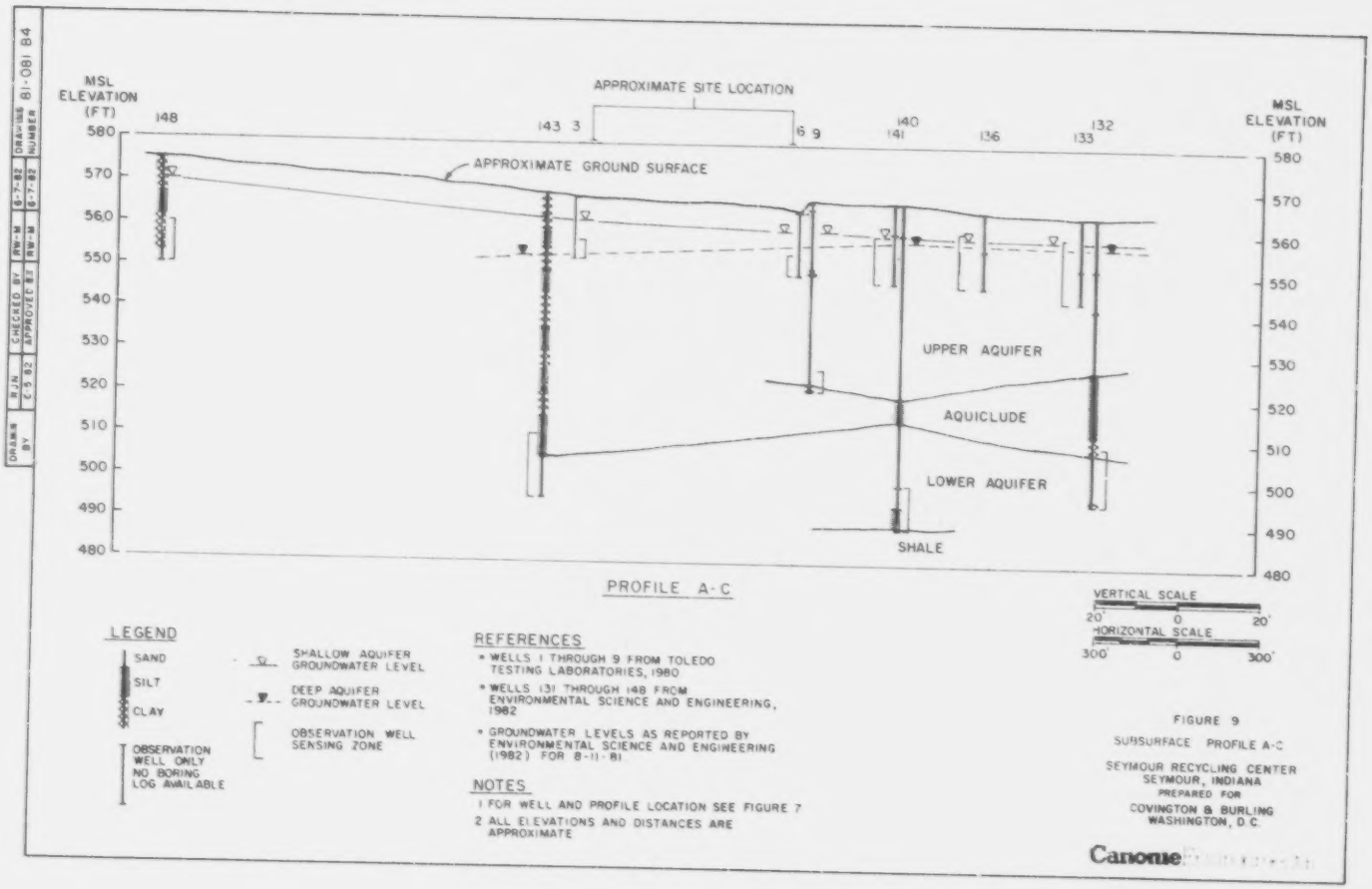


FIGURE 9

SUBSURFACE PROFILE A-C

SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.

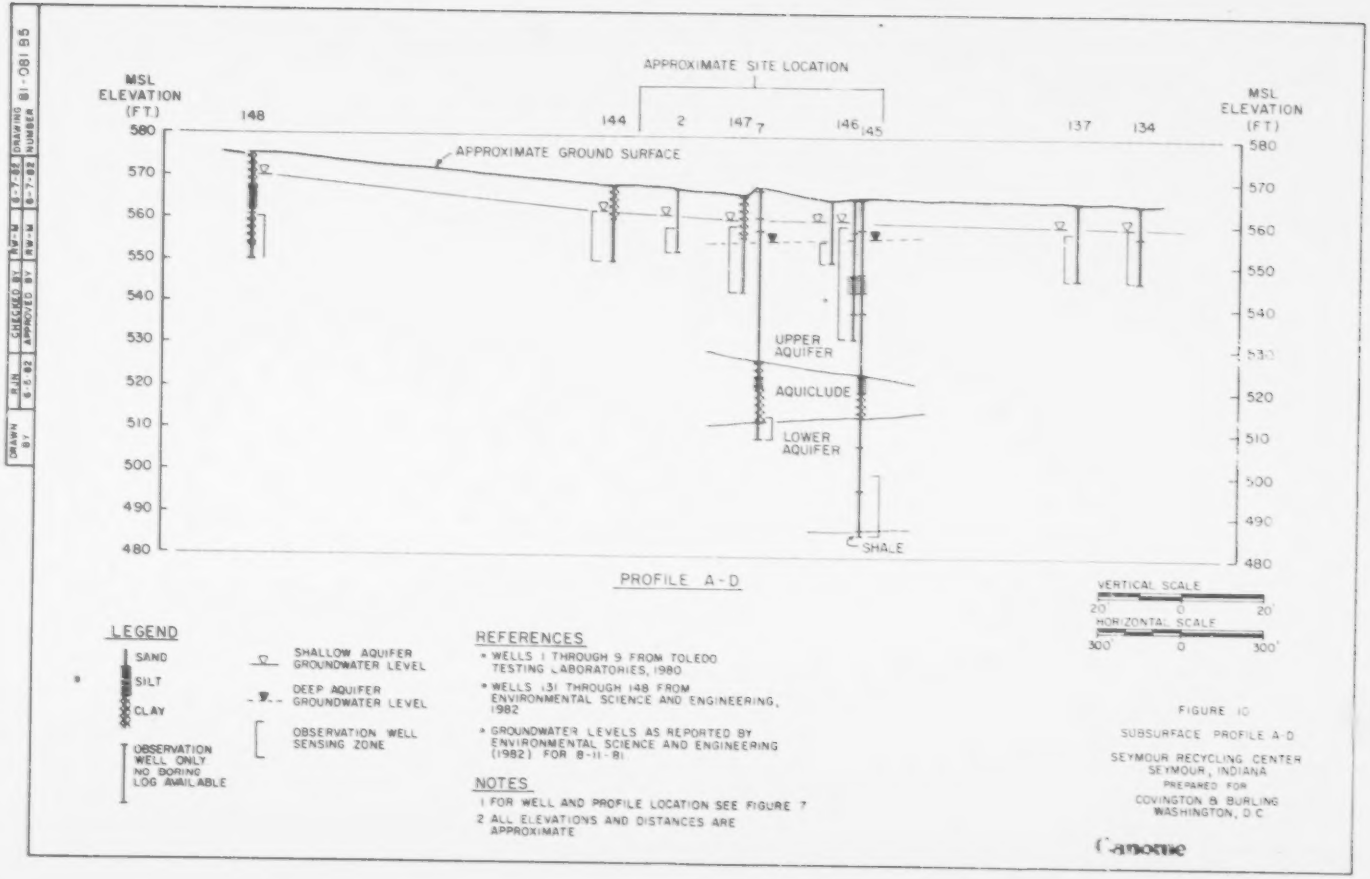


FIGURE 10

SUBSURFACE PROFILE A-D

SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.

Canonie

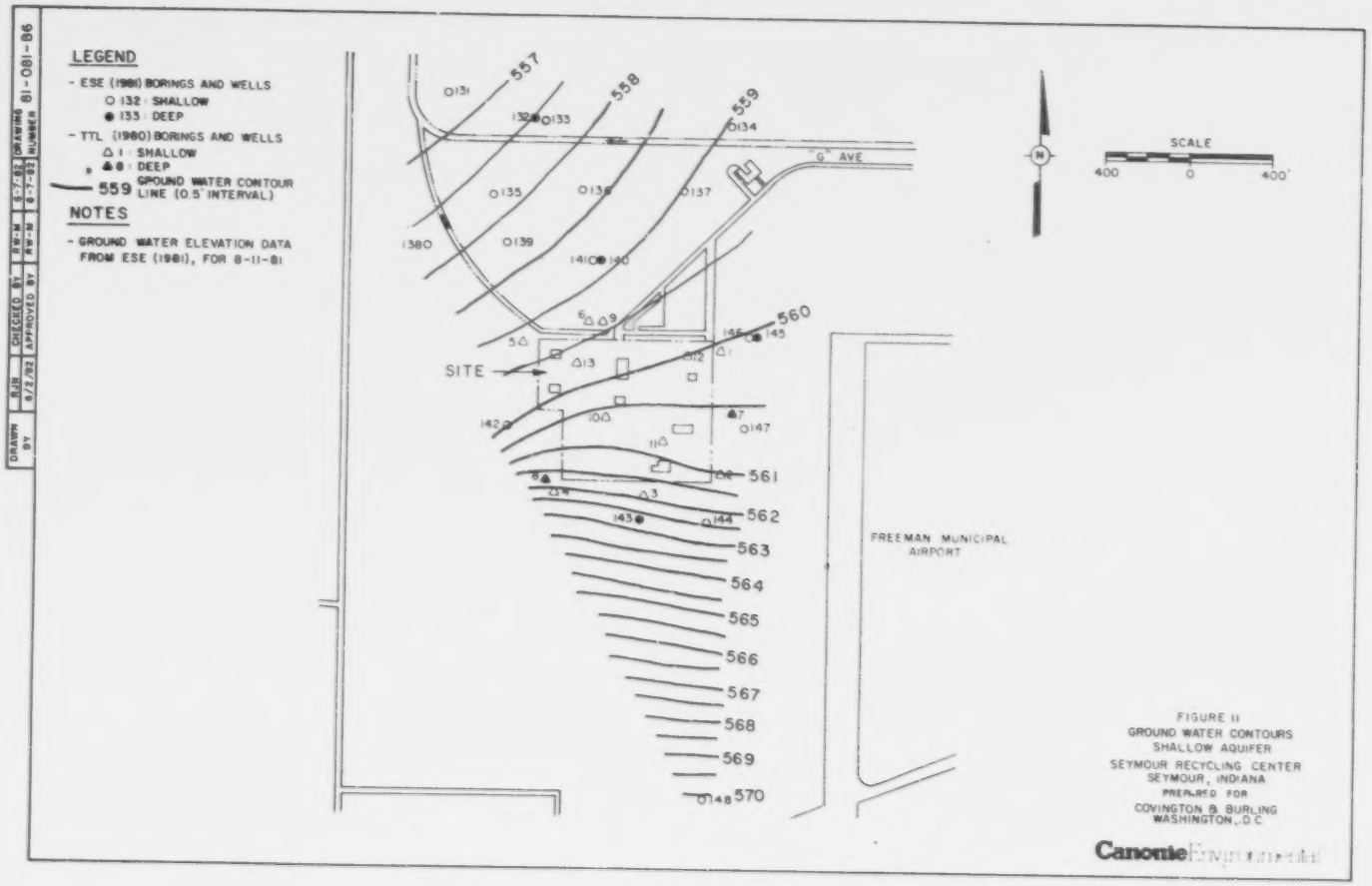
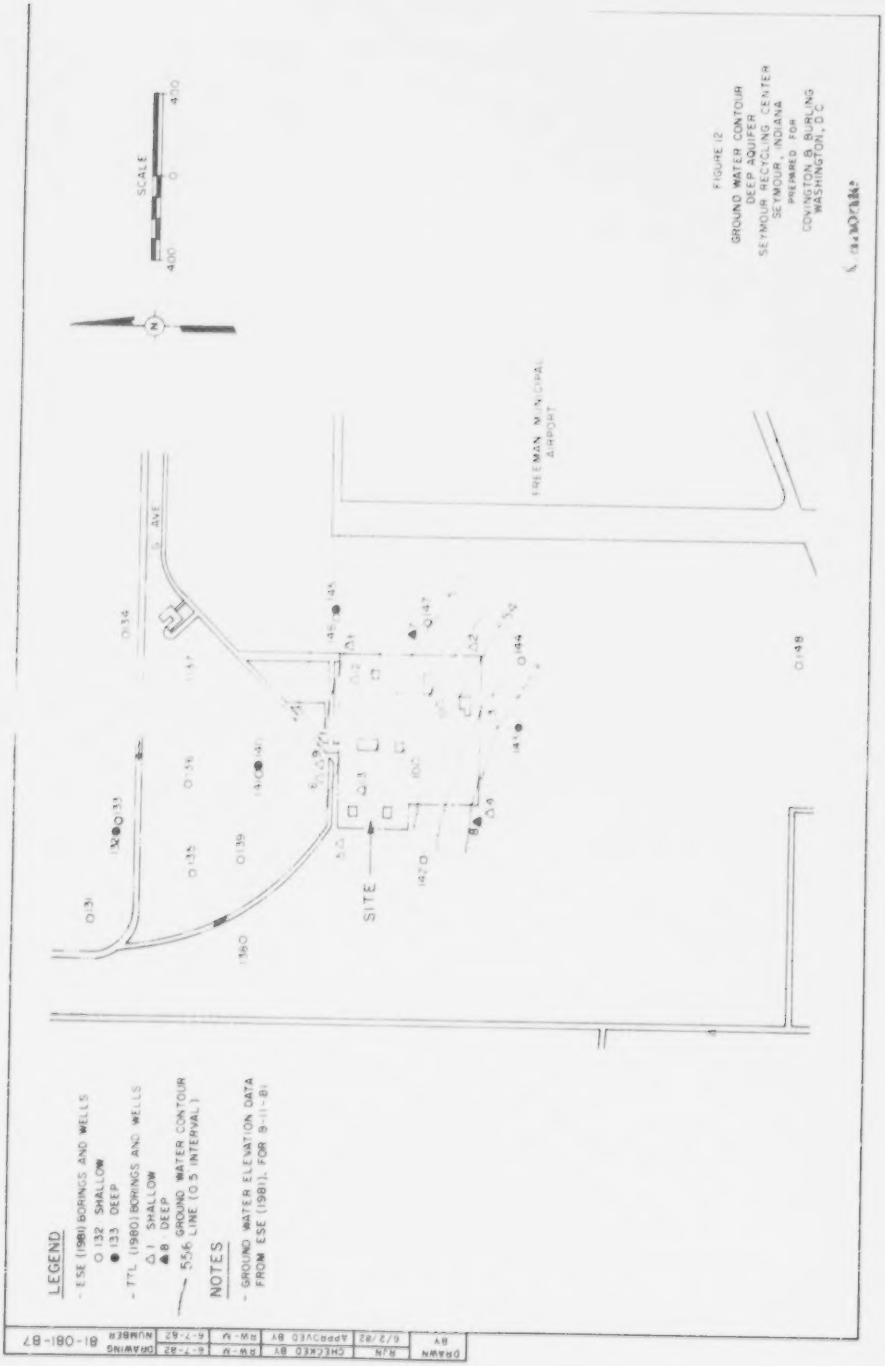


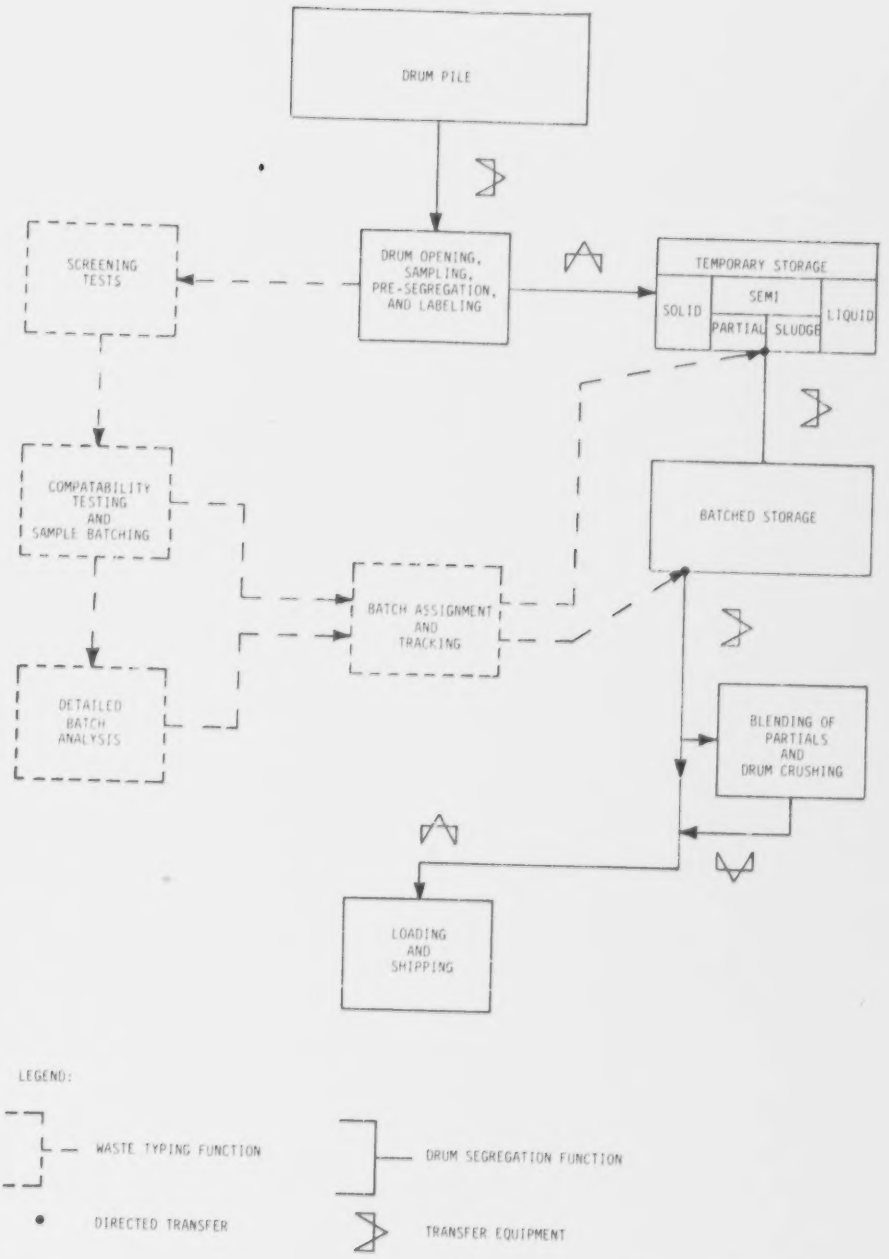
FIGURE 11
GROUND WATER CONTOURS
SHALLOW AQUIFER
SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.

Canonie Environmental


LEGEND
- ESE (1981) BORINGS AND WELLS
O 132 SHALLOW
● 133 DEEP
- TTL (1980) BORINGS AND WELLS
△1 SHALLOW
▲8 DEEP
5516 GROUND WATER CONTOUR LINE (0.5 INTERVAL)
NOTES
- GROUND WATER ELEVATION DATA FROM ESE (1981), FOR 8-11-81
SCALE
400
0
400
N
SITE
FREEMAN MUNICIPAL AIRPORT
FIGURE 12
GROUND WATER CONTOUR
DEEP AQUIFER
SEYMOUR RECYCLING CENTER
SEYMOUR, INDIANA
PREPARED FOR
COVINGTON & BURLING
WASHINGTON, D.C.
DRAWN BY
RJN
6/2/82
CHECKED BY
RW-K
APPROVED BY
RW-K
DRAWING NUMBER
81-081-87

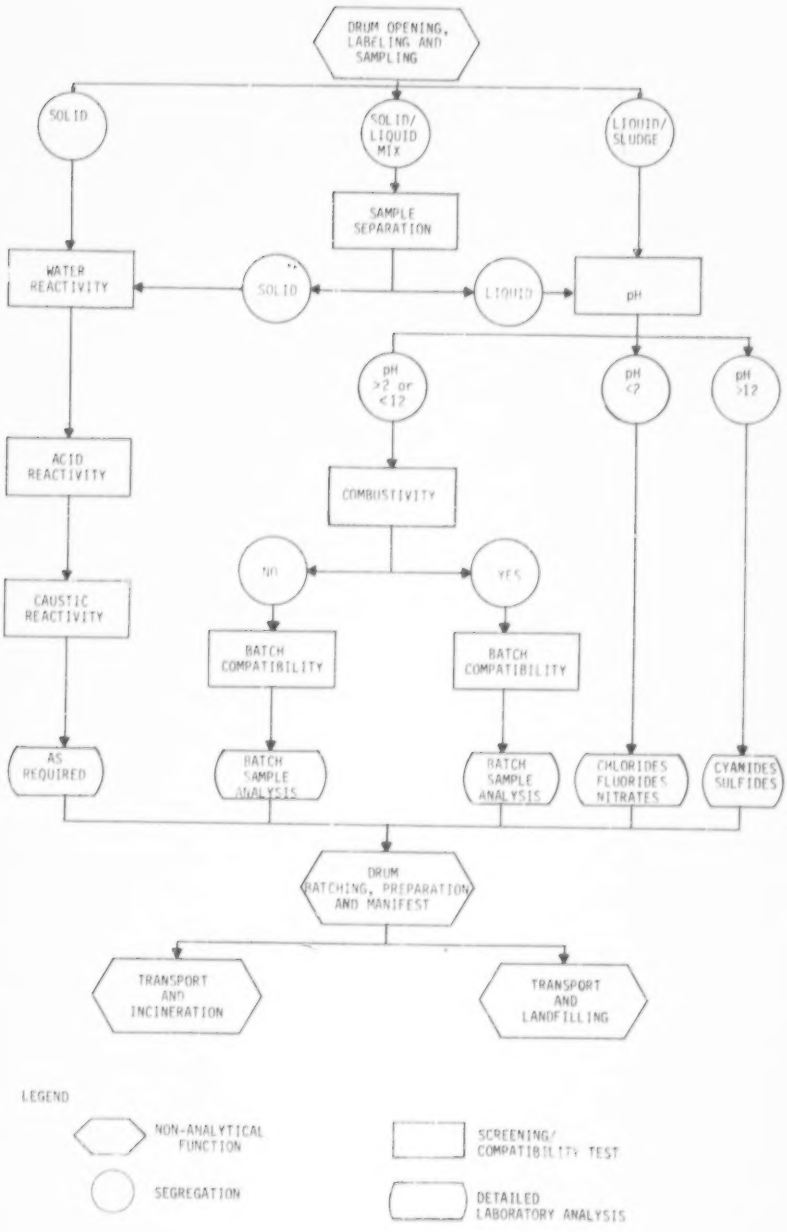
APPENDIX A

FUNCTION FLOW CHART I
DRUM SEGREGATION AND WASTE TYPING



Canonie Environmental

FUNCTION FLOW CHART 2
WASTE CHARACTERIZATION



Mr. LEVITAS. Thank you.

Why don't we now proceed. Let's hear from Mr. Chu. His presentation. Then Mr. Bonczek and I know that members of the committee have a number of questions to all of you, but I would like to get your testimony, Mr. Chu, next, and then Mr. Bonczek.

Mr. CHU. Mr. Chairman and members of the committee. I am Joseph P. Chu, assistant director, plant environment, environmental activities staff of General Motors. My responsibility at GM is the coordination of corporate-wide programs for the control of industrial waste and toxic substances. With me is Mr. Leonard F. Charla, an attorney with the GM legal staff. I would like to summarize the following statement and ask that the entire statement as submitted to you be entered into the record.

GM is one of four trustees responsible for managing the $7.7 million Seymour Site Trust Fund. I would like to make a note here that the $7.7 million includes a contract for the cleanup of the Seymour Recycling waste and additional money is to be used for other purpose such as monitoring. Therefore Chemical Waste Management did not receive $7.7 million of the contract.

Mr. LEVITAS. Let me make sure I understand what you said. You said the $7.7 million is the total cost of the settlors of which a portion of that was for the chemical waste contract.

Mr. CHU. Ninety-nine or whatever percent. But there was some money spent for a consultant to oversee the operations. Some money spent for air monitoring.

Mr. LEVITAS. Well, Mr. Molinari asked a question earlier, what was the cost—what was the cost to the settlors. We have not yet asked Chemical Waste what the cost was and that's a question that will be put to them. How much it cost them. But I just wanted to clarify that.

Mr. CHU. OK. Thank you, sir.

For the total surface cleanup of the Seymour Recycling Corp. site, I represent GM in carrying out the functions of a trustee. In this capacity, I am glad to report that in January this year all the waste and contaminated soil as identified in the consent decree for this cleanup has been removed from the site. Therefore, these potential sources of groundwater contamination have been removed.

GM has always had a corporate-wide policy of compliance with all applicable regulations regarding the disposal of hazardous waste. We use only properly permitted transporters and storage, treatment and disposal facilities. Prior to the mid-1970's, GM's waste management practice had concentrated on pollution source control and resource recovery. For example, we conducted projects on waste oil and junk car recovery and a development in which old tires were used as a fuel for stationary boilers.

Since May 1980, when EPA hazardous waste regulations were promulgated, GM's practice have reflected the corporation's continuing concern for compliance with increased hazardous waste regulation, while maintaining and improving where possible our source control and resource recovery programs. For example, the problems associated with the use and reuse of drums containing material and their disposal have been minimized by implementation of a reusable Magnadrum program as part of our source control program.

Prior to enactment of the Resource Conservation and Recovery Act, GM put into effect in 1970 an environmental performance review procedure, by which a corporate team audits compliance by all plants with existing environmental protection laws and regulations. One element of this program is to verify whether the plant in question has followed GM's directions to visit disposal sites annually and to obtain copies of the permits or licenses issued to such businesses. This procedure is still in effect and is designed to ensure that only properly licensed and operated facilities are used by GM plants.

Of course, one of the important aspects of GM's compliance is to closely monitor changing and new Federal and State laws and regulations on hazardous waste management. The definition of hazardous waste may change from time to time and may vary among States. Consequently, our approach is to view waste management as a corporate wide responsibility based on all waste materials, not just those which may be declared hazardous at one point in time.

This brings me to the subject of dispoal technology development—technology not involving land disposal—GM encourages manufacturing process control in our plants that minimize waste generation. We also practice waste reuse where practicable. This practice is not only environmentally sound, but also is cost effective, since energy and/or material are recovered. Waste oil recovery is an example of this process. Certain wastes which we cannot recover are disposed of at approved GM facilities or are transported to permitted non-GM facilities for recovery, treatment and disposal, in this sequence of preference.

GM has developed several waste recovery processes. As additional examples, our chromium recovery processes at two locations have been in operation for more than 10 years. Our hydraulic fluid recovery process for polycholorinated biphenyl, or PCB, removal has been in operation for more than 2 years. We do not believe landfill should be the only means for waste disposal. In fact, we avoid landfill disposal when possible.

Now I would like to return to the Seymour situation. GM plants used the services of Seymour Recycling Corp. because it was not a landfill but rather a waste recycling and incineration facility.

I first became involved in the Seymour remedy on April 10, 1980, when an official with the State notified us that two other companies had identified and removed drums from the site. A group of GM division and plant personnel was assembled at the site on April 30, 1980, to search for drums that might contain GM waste. No such drums were identified and so none was removed

In August 1980, GM representatives were invited by Cummins Engine Co. to attend an August 11 meeting for a discussion of the possibility of industrial participation on the cleanup of the Seymour site.

Beginning in the fall of 1980 and through the winter of 1981, GM began to receive letters from the U.S. attorney's office in Indianapolis. The tenor of each of these letters was that certain GM plants had sent materials to the site. However, it was our conclusion that these materials probably had been incinerated or recycled by the time the letters were received. Indeed, GM plants had repurchased

certain of the recycled materials from Seymour during the early and mid-1970's.

In April 1981, Mr. Charla met with a member of the U.S. attorney's office in Indianapolis and indicated that GM was willing to cooperate with the Federal Government in the Seymour matter as soon as information essential for beginning negotiation was provided by the Government.

In August 1981, a group of generators began meeting from time to time. At an April 1982 generators' meeting, one of the company representatives suggested that the generators agree to make financial contributions so that the settlement negotiations could begin. The first negotiations were held in Washington, DC, in May 1982, with representatives of the generators and the government.

It was at one of these meetings, after negotiations had reached an impasses because of the varied interests among the large number of parties represented, that a small group of generators was formed to accomplish a complete surface cleanup. The parties continued to negotiate through the summer of 1982. On November 10, 1982, the parties petitioned the U.S. District Court for a consent decree. This was granted later in 1982 after two public hearings.

GM's view is that this consent decree was the best possible solution from a public health and environmental protection standpoint for at least the following reasons: One, under the Superfund Act, the remediation could not have begun in 1982 without the $7.7 million contribution from the 24 settling companies. Two, the consent decree got the remediation process started before the onset of the winter of 1982–83. Had the process failed to start, the threat to public health and welfare would have continued longer. And three, the consent decree eliminated at the earliest possible time concentrated surface sources which potentially could result in ground water contamination.

Thus, the protection of public interest in preserving ground water purity was not disregarded, nor was it given secondary consideration. Information and data available in 1980, and up until the present, show only a potential of ground water contamination by the Seymour site. And since this site has now been cleared of all wastes and visibility contaminated soils, it is my professional judgment that continued ground water monitoring at the site will most likely show no significant contamination. To the contrary, I believe such monitoring will show that the total surface cleanup project, of which GM is a part, has prevented any significant ground water pollution which could have occurred had the cleanup been delayed.

I believe that the remedial project supported by the 24 companies was a good project for preventing potential hazards at and below the site. Moreover, it was accomplished in a timely fashion, because the only other alternative would have been to pursue the matter in court, where delays can be numerous and long. The public record will show that our belief in the appropriateness and timeliness of this remedial project is supported by declarations from officials of EPA, the Justice Department and by the Federal courts.

Mr. Charla and I will try to answer any questions you might wish to ask. Thank you.

Mr. LEVITAS. Thank you very much, Dr. Chu. I appreciate that. I am sure you realize that it comes as no great surprise to us that you agree with Mr. Hedge that this was a good deal for everybody involved and for the public good; and we will return to that in just a few moments.

Now, Mr. Bonczek. You're not going to surprise us with your position are you?

Mr. BONCZEK. No, sir. I'm not going to surprise you.

Mr. LEVITAS. It would be most curious if you did.

If you would bring that microphone just a little bit closer it would be helpful.

Thank you.

Mr. BONCZEK. Mr. Chairman, my name is Robert Bonczek. I am the director of Safety, Health, and Environmental Affairs for the Du Pont Co. With me is Mr. Gene Berman, senior environmental counsel. We would like to summarize our statement and would be pleased if the complete statment would be included in the record.

Mr. LEVITAS. I might add that Dr. Chu's statement and your statement, Mr. Bonczek, will be made part of the record in their entirety and without objection, it is so ordered.

Mr. BONCZEK. Thank you. In the interest of time and to give you the opportunity to ask us more questions, I would like to summarize and highlight it as far as I possibly can.

I will start with our corporate environmental policy.

Ms. FERRARO. Excuse me. Could I ask you to pull that mike just a little bit closer.

Thank you.

Mr. BONCZEK. Basically our corporate environmental policy has three elements. First, to comply responsibly with all legal requirements. Second, we will conduct our operations in such a way that they are protective of health and the environment. And third, we will make even further improvements where they are cost effective.

Under the umbrella of this corporate environmental policy is our corporate waste management policy. Briefly it states that we will minimize the generation of waste as far as we possibly can, making extensive use of recycling and reuse. Whatever waste that remains will be handled in an environmentally sound manner. We will manage our waste, in so far as we can, using company facilities and using treatment options which result in the destruction of waste, for example, incineration and biotreatment, as opposed to containment options whenever practicable.

We will audit our internal practices to assure that company policy is being adhered to, and when we use outside contractors, we will make initial thorough technical evaluations to assure ourselves that they are competent technically and also qualified legally to do the job. Periodically, at least annually, we will evaluate their performance.

Now I would like to turn to the cleanup of hazardous waste disposal sites. Over the last dozen years or so we have refined our policy for managing hazardous waste. Technological, economic, environmental and regulatory factors have evolved and have become more sophisticated.

Within Du Pont, we have identified several sites where our past practices were not adequate given today's standards. We have, voluntarily, taken appropriate action to rectify this problem. With respect to the cleanup of non-Du Pont sites, we recognize that funding and governmental action is needed and we support the national Superfund and we supported it's enactment. To date, Du Pont has paid in excess of $40 million in Superfund taxes.

Now I would like to turn to the settlement policy that we have in Du Pont which we used as a basis at Seymour. The underlining basis for our settlement policy is our belief that it is of paramount importance to get the necessary cleanup efforts going promptly. The first reason is environmental. Prompt cleanup is needed to protect health and the environment; there is no questions about that. Second are the economic considerations. Delayed cleanup at the surface can make later subsurface cleanups more expensive. Third, liability considerations. Prompt cleanup minimizes the potential for injuries, and, therefore, also minimizes the potential for resultant lawsuits. Last, public relations; the presence of these abandoned hazardous waste sites is a black eye to the chemical industry, and to some extent, to all industry involved.

More specifically, our policy on settlement is that when we are significantly involved in a site which may be causing environmental problems, we will settle if the settlement amount is fair in light of the level of hazard and the degree of our involvement. In the last few years we have contributed a significant amount of money toward the settlement of a number of sites. The Seymour settlement was one such situation.

I would now like to turn to the Seymour situation. I think the IBM and GM witnesses have given you a very thorough and accurate description of what happened there and I will try not to reiterate that.

Basically, Du Pont contracted with Seymour over the period 1971 through 1976 and again briefly in 1978 to incinerate waste solvents. Seymour was fully permitted, as has already been stated, to do the job and was fully technically competent with an incinerator to incinerate these particular wastes.

We first became aware of the many problems at the Seymour site when we received a demand letter in October 1980. Our people subsequently met with the Government and industry representatives to assess the situation and also to ascertain the degree of our involvement at that particular site. The records at Seymour indicate that upwards of 94 percent of the waste solvents that we sent to Seymour were, in fact, incinerated. But the records do not substantiate what happened to the remaining 6 percent.

Nevertheless, an overriding concern at the time was that there were 60,000 drums of waste in some state of deterioration present on the surface which were contributing or could contribute to any subsurface problem that needed to be cleaned up. And no Government funding was available.

After seemingly endless debate, proposals and counter-proposals, the settlement agreement that we are discussing today surfaced. We looked at this hard in light of all the considerations, we thought that it was a fair deal—a fair deal for Du Pont, a fair deal for the public and clearly in the public interest and clearly in the

interest of the environment. Consequently, we decided to participate.

There were risks involved. It was uncertain if there was a significant ground water problem. If there wasn't one, non-settlors would get off easy. We would have paid more than our fair share. We also felt we were foregoing significant legal and factual defenses that might have been used to preclude or reduce any Du Pont liability.

Nevertheless, we were, and are still, confident that our decision to go ahead with this decision was the right thing to do for Du Pont and for the public. A review of this settlement which occurred in Federal court concluded the fact that the settlement was legal, fair, reasonable and in the public interest. No one even alleged that the cleanup plan was not critically needed and fully adequate. In fact, among such groups as the League of Women Voters and the city of Seymour all endorsed—even praised—the plan.

In closing I would like to address the Superfund situation. We think that Superfund is basically a sound piece of legislation and we support its reauthorization. We think its implementation could be improved if EPA would encourage more voluntary cleanups.

As far as specific legislative changes, we support reauthorization beyond the act's current 1985 funding deadline. Although the extent of additional funding is still unclear. We also believe that a broad-based waste-end tax would be more marketable than the current fee structure tax.

Mr. Chairman, for the record, I would like to submit the statement made by Mr. Louis Fernandez of CMA to Representative Florio's subcommittee, I guess it was only last week, to give you a more accurate description of our position on Superfund.

Mr. LEVITAS. Whose statement is that?

Mr. BONCZEK. Mr. Lou Fernandez. He's Chairman of Monsanto and he was down here speaking on behalf of the Chemical Manufacturers Association.

Mr. LEVITAS. Without objection, it will be made a part of the record.

[Statement referred to follows:]

STATEMENT OF DR. LOUIS FERNANDEZ, CHAIRMAN OF THE BOARD, MONSANTO CO.

The Chemical Manufacturers Association is a nonprofit trade association whose member companies represent more than 90 percent of the productive capacity for basic industrial chemicals in this country. In our testimony before this Subcommittee on November 10, 1983, we announced our strong support for an effective national program to clean up problem waste sites, and stressed that we will play a cooperative and constructive role in the process leading to Superfund reauthorization. Carrying forward with that commitment, we testified before the Subcommittee again on January 25, 1984, and announced our support for a national waste disposal tax as a major funding component of a reauthorized Superfund program. We are returning today to present our views on one of the first specific Superfund reauthorization proposals -- H.R. 4813, introduced on February 9, 1984.

We respect the sponsors' concerns with the pace of the Superfund program and share those concerns. We are now seeing significant progress in the program, however, and we believe that EPA's efforts should be given a chance to proceed under the structure of the current law. We believe the sponsors' initiatives have provided an excellent focus for all who are interested in the Superfund reauthorization process.

Our views on H.R. 4813 (hereafter, the "Bill") can best be understood if we first state our fundamental principles in approaching Superfund reauthorization. We believe that Congress can and should reauthorize Superfund by (1) determining realistically what EPA's annual funding needs will be, and providing for such levels; (2) deriving these funds from industry taxes which are much more broadly based than the current law

would provide; (3) imposing these taxes for a five-year period so the needs can be reexamined; and (4) re-enacting the current law unchanged in all other respects.

Viewed in this light, it is apparent that we cannot support this Bill. Our most significant problems are as follows:

First, the amounts the Bill seeks to raise from industry taxes are exceedingly high, and appear to have no relationship to the amounts EPA would actually use even under an expanded and expedited cleanup program;

Second, the Bill would continue reliance on the "feedstock" approach as the primary source of funding, and at the higher taxing levels proposed, greatly magnify the problems of that narrow-based approach;

Third, the Bill would impose these exceedingly-high, narrow-based taxes on a permanent basis even in the face of all of the uncertainties of future funding needs; and

Fourth, the Bill would impose a vast number of unnecessary amendments onto a law which already provides a good workable framework for waste site cleanup and which is now clearly working.

In part I of this Statement, we will discuss these four most significant problems. In part II, we will explain other problems we have with some controversial and unnecessary amendments the Bill would impose on the current law. In part III, we will discuss more fully our concerns with the industry tax structure of the Bill.

After the Subcommittee invited us to testify on the Bill for the March 8 hearing, Congressman Lent introduced an alternate

Superfund reauthorization bill (H.R. 4915, February 23, 1984). Because the purpose of this hearing is to focus on H.R. 4813, and because we have not yet analyzed all of the details of H.R. 4915, we have not prepared a separate statement on H.R. 4915. At appropriate points in this Statement, however, we will indicate how that bill appears to compare with our own basic principles for Superfund reauthorization. Generally, we have significant problems with many aspects of the Lent Bill, although in some areas it appears to offer a more acceptable approach than H.R. 4813.

I. Most Significant Problems

A. Amounts of Annual Taxes

Congress should provide annual funding levels which are sufficient for a strong cleanup program. Especially when funds are being raised from taxes on a narrow segment of the economy, however, Congress should not force tax payments substantially earlier than the funds are needed. We believe that this is precisely what the Bill would do.

The current industry "feedstock" tax structure, which accounts for 87½% of the total Superfund revenues, is designed to raise approximately $307 million a year. The "feedstock" provisions of the Bill are designed to raise approximately $1.6 billion a year, and the new "waste end" provisions are designed to raise approximately $600 million. Thus, under the Bill, the annual feedstock tax revenues would be increased by over 500% and the total industry tax would be increased annually by about 700%. Under the Lent Bill, the total industry tax would be increased

annually by about 500%. Yet we, the taxpayers, have been left totally uninformed as to any rationale supporting such needs. And we do not believe anything approaching the proposed levels in either bill can be justified.

We believe it is Congress' duty to pursue thoroughly with EPA the annual funding levels that will be needed, and it is EPA's duty to be forthcoming with realistic projections for Congressional and public scrutiny. In analyzing the funding needs issue, one must recognize that each site requires a phased approach of careful study, planning, engineering, and construction. Thus, in any given time period, EPA personnel -- even with additional resources -- can be expected to process a finite number of assessments, investigations, studies, design contracts, and construction contracts. And only as these projects are processed will the need arise to obligate and expend funds. Another important factor is the amount that EPA can be expected to receive from liable parties and post-cleanup reimbursement. This "cost recovery" element can provide a significant amount of EPA's annual funding needs that will not come from taxation.

Congress should also recognize and account for the fact that a great amount of industry dollars will go directly into site cleanups without first being taxed and funnelled through the fund. The law properly encourages EPA to determine whether responsible parties can perform or pay for a site cleanup and to consider this as an alternative or supplement to a fund-financed response. The more EPA can make of industry's resources in this way and allow industry to contribute its dollars,

management, and engineering expertise, the more the site cleanup program can be expedited.

We have in fact recently obtained EPA figures, current through February 22 of this year, which illuminate this point. They show that even in the relatively early stages of the cleanup program that we are in, EPA has already reached enforcement agreements with private parties for full or partial cleanups at 76 sites with a total value of over $270 million. Even these figures do not reflect a significant number of industry-financed cleanups that have resulted from enforcement agreements with state or local governments, and from voluntary activity at company-owned sites. Thus, our tax payments into the Superfund do not even begin to reflect the resources we are devoting to solving the waste site cleanup problem.

To see how unrealistically high the annual funding levels in both bills appear to be, one should reflect upon the projections contained in EPA's study which the sponsors of the Bill recently released to support their proposal. I am referring to the EPA document of December 8, 1983, entitled "Superfund Task Force Preliminary Assessment."

This study estimates dollar figures for the cleanup of all waste sites that may be placed upon the Superfund National Priorities List (NPL). It assumes ranges from 1000 to 2200 sites, and projects <u>total</u> cleanup and program costs in these ranges to run from $5.8 to $14.5 billion. This study does not, however, contain the crucial missing number that Congress must explore with EPA: projections of <u>annual</u> expenditure needs.

Yet one can perform his own calculation to estimate what such a number could be. On page 13, the study assumed that EPA might take 14 years to complete an NPL of 1800 sites. At this rate, about 128 sites per year would be completed. Significantly, this projected rate is even faster than the rate called for by the Bill, which requires cleanup of the current 546 NPL sites in 5 years.

For the 1800-site range, the study projects total costs to be approximately $12 billion. Even assuming the rate of 128 sites per year could be attained -- an assumption which warrants careful scrutiny -- one can divide the 14 years into 12 billion dollars to arrive at an annual expenditure level. This number is approximately $850 million per year, barely one-third of the $2.4 billion per year which the Bill would demand.

We are not prepared at this time to say whether this $850 million expenditure level is correct. This is a preliminary study, and it contains numerous caveats about the need for further assessments. Moreover, even this tentative $850 million expenditure level does not reflect a <u>taxing</u> needs figure, for the 12½% general revenue share would reduce such needs by $100 million and a significant amount must be deducted to account for revenues from interest to the fund and cost recovery.

We are prepared to say, however, that the foregoing is the <u>only</u> exercise we have seen in which there has been an attempt to use EPA estimates to arrive at an annual program needs figure. We challenge Congress to pursue this analysis in more detail with EPA, and believe that is the only responsible way to go about raising our taxes.

We realize there will be a degree of uncertainty in any projections, so we support the idea of a "capping" concept in the law. This can provide built-in protection against substantial surpluses accumulating in the fund should annual revenue needs prove to have been overestimated. Under a "capping" concept, once the fund balance reached a surplus level sufficient to assure that the fund would not be depleted for a specified period, the taxes would be suspended for that period.

Although the Bill contains a "capping" concept, its requirement that the fund balance must stay above $3 billion is as excessive as its proposed annual taxing levels. A "cap" should be set to assure that if taxes are suspended for a year, there will be sufficient revenues to carry the program for that year. The "cap" should accordingly match whatever annual funding level is determined to be appropriate, with perhaps a reasonable safety factor built in. As we have already discussed, there is no reason to believe anything approaching $3 billion is the proper amount.

B. Structure of Funding

Our second significant objection to the Bill is the method by which revenues would be raised from industry. As we testified on January 25 of this year the "feedstock" tax, even at current levels, is highly inappropriate. When a highly inappropriate tax is increased by 500%, the degree of its impropriety is greatly magnified. We have the same basic objection to the Lent Bill.

The current tax structure must be fundamentally changed so the burdens are more evenly shared by those segments of the economy and society involved in waste disposal. We accordingly have developed our own proposal for a national waste disposal tax. Based on current estimates of all hazardous waste disposal, a tax rate of $50 per dry weight ton would raise over $300 million a year.

We recognize that funding beyond this level should not be provided by a waste disposal tax, and we do not support a waste disposal tax beyond this level. As we testified on January 25, to the extent Congress finds it necessary to provide for a higher level of funding, Congress should develop a mechanism to supplement the disposal tax which is also much more broadly-based than the current "feedstock" tax. We are developing our recommendations for a broader-based approach to raise those supplemental levels, and will soon be able to present our recommendations to Congress.

We are pleased to see that the Bill includes a waste disposal tax. But we believe that our proposal for $50 per dry weight ton is superior to the proposal contained in the Bill. We discuss this point in detail in part III of this Statement. Our primary concerns are the workability of the system proposed by the Bill, the fact that its "wet-weight" basis will operate to favor landfilling over other forms of disposal, and the fact that it may improperly tax various forms of beneficial waste treatment. As we explain in part III, we have the same fundamental concern about the "wet" basis of the Lent Bill, although the Lent

Bill's approach to a waste disposal tax is more workable in other respects.

C. Permanence of Funding

In the original Superfund, Congress wisely resolved the issue of the length of the funding authorization. Because of the tremendous uncertainties of the scope of the inactive waste site problem and the rate at which the sites could be cleaned up, Congress chose to provide funding for five years and then to re-examine the matter to determine whether and how much additional funding should be provided.

Although we know more now than we knew in 1980, great uncertainties remain, especially about the total number of sites that may need to be cleaned up and the degree to which fund monies will be necessary to provide for cleanup. EPA's own current analysis cannot project the number of NPL sites any closer than "1400 to 2200."

We accordingly object to the "permanent" taxation structure of the Bill. Funding levels that are determined appropriate should be raised for another five years so additional needs can be examined toward the end of that period and necessary adjustments can be made. As long as there is a waste site problem which needs to be addressed with funding, the public will support reauthorization and Congress will have no trouble enacting it. Once the problem is resolved, however, it should not be the taxpayers' burden to have to initiate and carry through with the legislative process to repeal the tax. The Lent Bill comports with our views in this regard.

D. Inclusion of Unnecessary Amendments

As we testified in November, aside from the need for new funding and adjustments to the funding structure, we believe that the law as now written provides a good, workable framework for the national waste-site cleanup program. We are fully aware of widespread frustrations that the program has not moved faster. Our industry, in fact, stands to benefit quite directly from getting this problem behind us, and we are as anxious as anyone to see that day come.

It is true that relatively few sites have been "completely" cleaned up so far. It is totally wrong, however, to jump from that fact to a conclusion that the law needs to be changed. Any massive new program takes time to gear up and get in place. And the very nature of the national waste-site cleanup problem requires that a great deal of work precede the completion of cleanup at many sites. Sites must first be identified and ranked so the most significant ones can be addressed in a priority fashion. Then, when a particular site is selected for cleanup, there must be a careful analysis to determine the appropriate remedy to protect public health. There must then be a design and construction phase which often necessarily takes several years. Thus, since the program is barely three years old, one can not rationally expect many sites to be "completely" cleaned up yet.

Despite the initial start-up difficulties with the program -- which had nothing to do with the way the law was written -- we believe that any fair analysis indicates that EPA is now making good progress and has made recent policy decisions which will even further speed up the process. EPA has stopped requiring the

states to pay 10% of the preconstruction planning costs; it has delegated more decisional and spending authority to its regional offices; and it has moved toward a policy of cleaning up first, and addressing legal liabilities later in cases where it is unable to settle with private parties.

And recent statistics show that the program is now escalating at a good rate. For instance, according to charts contained in the December 8 EPA study, the number of remedial investigation/feasibility studies initiated -- and this number is a direct indicator of the number of remedial actions which will follow -- has jumped from 21 to 30 to 87 in fiscal '81, '82, and '83 respectively. Moreover, the other key component of the cleanup program -- enforcement settlements which rely on direct industry dollars unfunnelled through taxes and the fund -- has been growing at a great rate. This program resulted in settlements worth $31.3 million, $49.4 million, and $91.1 million in fiscal '81, '82, and '83 respectively. And the program has already produced settlements worth $102.7 million in fiscal '84, which is not even half over.

It is especially interesting to note that the EPA study released by the sponsors of the Bill indicates that EPA carefully considered whether the current law should be amended. The study concluded on page 18 that because of the "sweeping authority granted the Agency" by the current law and other factors, a "simple extension of existing authorities" should be recommended, with perhaps adjustments only to the funding level and structure. The only exception was the study's recommendation to revise one section which deals with post-closure liability for RCRA

facilities. This section has nothing to do with the waste site cleanup program, however.

Because the program is now beginning to produce and EPA is "on track" under the currently drafted law, we think it would be irresponsible to encumber the process with many new significant amendments which can only disrupt the process and distract EPA from the track it is on. Moreover, such controversial amendments can only delay the reauthorization of needed funds for EPA. We have identified numerous problems with the many proposed amendments contained in the Bill and discuss them in part II of this statement. We note that the Lent Bill would also impose numerous such amendments.

Moreover, in our testimony of November 10, we noted our concern over the potential for so-called "victims' compensation" proposals to divert attention from the task of reauthorizing the Superfund cleanup program. The question of providing entitlements for chronic diseases in America is a serious subject, and one that deserves to be carefully deliberated by Congress. Because of all of the broad health, scientific, legal, economic, and social issues involved, however, it is totally inappropriate for Congress to treat this important matter merely as an "add-on" to a waste-site cleanup program. Yet the Bill contains a major new federal entitlements program for chronic diseases. We are pleased to note that the Lent Bill contains no such provisions.

In addition, as we testified before this Subcommittee on June 29, 1983, it would be precipitous for Congress to enact new federal administrative entitlement schemes in the absence of reliable information linking waste sites to widespread harm. It

must be remembered that the proposals suggested by the majority of the Superfund §301(e) study group were based on the assumption that waste sites would injure large numbers of people and that resulting "massive" claims would cause the current tort system to fail.

We care about people who may possibly be injured by waste sites, and we believe that anyone who has actually been injured from a waste site should be compensated by those who caused the injury. In fact, we support strong federal programs to regulate existing sites and to clean up inactive sites to help prevent potential injuries. We simply do not believe there is evidence of "massive" injuries requiring a major new federal program as an overlay to the tort system which now exists to provide personal injury compensation. In fact, we continue to see reports of major settlements or victories for plaintiffs in tort suits in which persons have claimed injuries from hazardous substances.

We do believe, however, that all of us would benefit from more scientific information on the issue of possible waste site/disease relationships, and we are taking steps to get this information. As we related in our June 29 testimony, we joined last year with the Environmental Defense Fund in a lawsuit to force the Department of Health and Human Services (HHS) to perform the health-study duties contained in Section 104(i) of Superfund. Our lawsuit resulted in a Consent Decree whereby HHS established the new agency required by Section 104(i) -- the Agency for Toxic Substances and Disease Registry (ATSDR) -- and agreed to perform the health-study functions contained in Section

104(i) on specific timeframes. The ATSDR is currently on schedule in meeting these deadlines.

A second step we have taken -- as related in our June 29 testimony -- is to assist in the sponsorship of an independent study on possible waste site/disease relationship by the Universities Associated for Research and Education in Pathology, Inc. (UAREP). UAREP is a consortium of fifteen major university medical schools. Under the terms of our joint sponsorship of this study with other organizations, UAREP is to conduct its scientific work and draw its conclusions completely independently of CMA and any other co-sponsors.

Thus, in light of the lack of any current reliable information that waste sites are causing injuries on a widespread basis, we must accordingly oppose the types of federal funding and administrative schemes for personal injuries proposed in the Bill. We encourage Congress to deliberate this issue fully on the basis of the developing information and separately from Superfund reauthorization.

II. Unnecessary Amendments

A. Level of Protection Required

1. How Clean is Clean?

The Bill would require that each remedial action meet a level of control which will "protect human health and the environment." §9004(f)(1). This is certainly the proper cleanup level to be achieved at each site, but such a statutory amendment is unnecessary. EPA has already made clear in the National Contingency Plan (NCP) that the remedial action selected must

provide "adequate protection of public health, welfare, or the environment." 40 CFR 300.68(j), 47 Fed. Reg. 31217, July 16, 1982. Though some had criticized the proposed NCP for allegedly allowing costs to override health and environmental concerns, EPA emphasized in issuing the final NCP that the factor of cost "does not take precedence over protection of public health, welfare and the environment." Id. at 31185, col. 1.

Some parties have expressed strong reservations, however, over vagueness in the NCP's provisions for determining what level of cleanup is necessary to protect health and the environment. These parties have argued that the NCP should specifically require cleanup to health and environmental standards at each site. These concerns seem to be the driving force behind additional provisions of the Bill, which impose highly detailed and rigid requirements for making such a determination. §9004(f)(2)-(4).

These provisions would require that any substance at a site be controlled to a level which is "equivalent" to the "most stringent" federal or state standard or criteria "applicable" to that substance. §9004(f)(2) and (3). The only way to avoid this requirement (other than the "fund-balancing" consideration already included in Section 104(c)(3) of Superfund) is to provide for protection "substantially equivalent" to the control which would be necessary to comply with this requirement. §9004(f)(4).

We oppose these provisions. First, legislation is unnecessary in light of a Settlement Agreement EPA has entered into with the Environmental Defense Fund (EDF) and the State of New Jersey. Second, the provisions may be so inflexible and

rigid as to require construction projects in many cases which will be much more extensive than necessary to protect health and the environment.

EDF Settlement Agreement. The Environmental Defense Fund (EDF) and the State of New Jersey brought suit in 1982 challenging the NCP in the U.S. Court of Appeals for the District of Columbia Circuit. (EDF et al v. EPA, No. 82-2234, D.C. Cir., filed October 14, 1982.) The principal issue EDF and New Jersey raised was the NCP's failure to specify cleanup to appropriate health and environmental standards.

After a long period of negotiations with the parties, EPA entered into a Settlement Agreement with EDF and New Jersey on January 16, 1984. On the issue of specifying standards, the agreement that EDF and New Jersey found acceptable provides for NCP amendments which will require that: (1) Relevant quantitative health and environmental standards and criteria developed by EPA under other programs be used in determining the extent of remedy and (2) if such standards or criteria are substantially adjusted (e.g., for risk level or exposure factors), then the lead agency must explain the basis for this adjustment. Settlement Agreement, EDF et al. v. EPA, January 16, 1984, approved by Court, Order of February 1, 1984, No. 82-2234.

Potential to Require Wasteful Construction Projects. The Bill tracks the general thrust of the EDF Settlement Agreement, in that the Bill would apply health and environmental standards and criteria under other laws (§9004(f)(2)) and allow a waiver under certain circumstances (§9004(f)(4)). The Bill's provisions are much more rigid, specific and inflexible than the EDF Settle-

ment Agreement, however. The Bill would "lock in" the agency and preclude it from developing a rational program to protect the public health through regulations. Moreover, the Bill's provisions could as interpreted often result in construction projects going far beyond what is necessary to protect health and the environment.

For instance, the EDF Settlement Agreement specifies that "relevant" standards and criteria will be used to protect health and the environment, while the Bill rigidly requires equivalence with the most stringent federal or state standard or criteria that is "applicable" to the control of each substance. §9004(f)(2). The EDF Settlement Agreement's approach is far more sound, for there are many federal and state environmental standards and criteria which have not been set at a level that relates to health or environmental protection. Many standards "applicable" to substances under the Clean Water Act or the Clean Air Act, for instance, may be technology-based requirements which often impose controls far beyond what is necessary to protect health or the environment at a specific location. Moreover, federal water quality "criteria" established under §304(a) of the Clean Water Act are not intended to serve as legally-enforceable requirements at all, but are merely intended to serve as "information" on which legally-applicable standards may be based.

Also, requiring control to such standard or criteria levels at a waste site might overlook entirely the question of the relevant human or environmental point of contact or use. For instance, a drinking water standard expresses concentration levels that people should not drink, and site remedial measures should

assure that people not drink substances in these concentrations. It may be senseless, however, to require that the concentration level specified in such a standard be met at a particular point around the site in situations where (1) the concentration would be substantially diluted or entirely dissipated by the time it reached a point where the water could be drawn for drinking or (2) the groundwater, for reasons apart from the waste site proximity, is not going to be used for drinking in any event. The EDF Settlement Agreement rationally allows for adjustments to be made for "exposure factors." It is not at all clear, however, that the Bill would. We note that the provisions in the Lent Bill dealing with this issue (§203) appear to track the EDF Settlement Agreement more closely.

The Bill's "waiver" provision (§9004(f)(4)) apparently does not provide a meaningful response to this problem, for it would still require "substantially equivalent" protection to that which would be necessary under its general requirement. If that level happened to be great over-protection, the "waiver" would apparently still require such over-protection.

2. State Right to Demand Superfund Dollars for More Construction than Necessary.

We also oppose the provision of the Bill which requires the use of Superfund dollars to help pay for remedies which are admittedly more extensive than necessary to protect human health and the environment. This subsection (§9004(e)(2)) allows states or their subdivisions to dictate a Superfund-financed remedial action that is more extensive than the one which has been deemed fully protective of health and the environment under the Bill so

long as the state or subdivision agrees to pay 90% of the cost difference between its selected remedy and the remedy which is protective of health and the environment.

An example will show how this could work. Assume EPA selects engineering design "A" at a site, which is fully protective of public health and the environment, and which will cost $8 million dollars. Assume, however, that a construction contracting firm convinces a state to demand engineering design "B" at a site, which will cost $12 million dollars. So long as the state pays 90% of the difference between 8 and 12 million (approximately 3.6 million) the Bill would force federal Superfund dollars to be used to finance the great majority of an unnecessary construction project.

While states now obviously retain authority under Superfund to impose any level of control they want as an independent matter of state law, this proposed "piggybacking on the federal piggy-bank" scheme will promote construction projects that benefit only contractors and not health and the environment. We note that the Lent Bill does not contain such a provision.

B. Standard of Liability -- "Joint and Several"

We oppose the inclusion of the phrase "joint and several" in the liability sections of the Bill. §§9007(a)(3), 9007(c)(3). As explained below, in light of the unanimous views of six federal judicial opinions, this language is unnecessary at best. At worst, this language implies Congressional rejection of these opinions in favor of a harsh, punitive regime under which one of

many contributors of a small share to a larger problem may be held liable for causing the whole problem.

Since October of 1983, six federal district courts have issued opinions ruling that "joint and several" liability may be applied under Superfund in appropriate circumstances. These opinions are:

(1) U.S. v. Chem-Dyne, 572 F. Supp. 802 (S.D. Ohio 1983);

(2) U.S. v. Wade, 20 ERC 1277 (E.D. Pa., December 20, 1983);

(3) U.S. v. A & F Materials Co., 20 ERC 1353 (S.D. Ill.), January 20, 1984;

(4) U.S. v. North Eastern Pharmaceutical & Chemical Co., 20 ERC 1401 (W.D. Mo. January 31, 1984);

(5) U.S. v. Conservation Chemical Co., 20 ERC 1427 (W.D. Mo. February 3, 1984); and

(6) U.S. v. South Carolina Recycling and Disposal, No. 80-1274-6, D.S.C., February 23, 1984.

Notably, these Courts have ruled that joint and several is not to be applied inequitably or in all situations. The first opinion (Chem-Dyne), from which all others have taken their lead, found that Congress deleted the phrase from earlier drafts of the final 1980 Superfund law "to avoid a mandatory legislative standard applicable in all situations which might produce inequitable results in some cases." Chem-Dyne, supra, 572 F. Supp. at 808. The Chem-Dyne opinion also made clear that multiple contributors' liability may be apportioned where there is a "reasonable basis for division" among them, and that defendants would have the burden of coming up with such apportionment. 572 F. Supp. at 810.

In following Chem-Dyne two months later, the Wade Court emphasized that Superfund "permits, but does not require" imposition of joint and several liability, and that it should not be used to produce "inequitable" results. Wade, supra, 20 ERC at 1285. The Court agreed with Chem-Dyne that apportionment should be provided where "a reasonable basis exists" for doing so, and that this apportionment would "ameliorate the harshness" of an automatic joint and several standard against any party in all cases. 20 ERC at 1286.

Similarly, the A&F Court stressed that the Congressional deletion of the phrase "joint and several" represented a "sensitivity to the fairness issue" by rejecting automatic application of a standard in a way that could be "extremely harsh and unfair." A&F, supra, 20 ERC at 1359. The court agreed with the Chem-Dyne analysis, and noted that under this approach, there could be "rational distinction[s] based on such factors as the amount and toxicity of a particular defendant's contribution to a waste site." 20 ERC at 1360. Other cases cited above followed the Chem-Dyne analysis. Conservation Chemical, supra, 20 ERC at 1430-31; South Carolina Recycling, supra, slip op. at 14.

In the face of such unanimity from six different federal district courts in various parts of the country, we do not understand why the sponsors of the Bill would seek to "unsettle" this case law. It does not appear that the intent in specifying "joint and several" in the statute is to ratify that case law, for the cases discussed above relied heavily on the absence of an express reference to "joint and several" in the statute to

support their reasoning. If the intent were to ratify the case law, then Congress should simply leave the statute alone.

If the intent is to make joint and several apply automatically in every situation so as to present the harsh, inequitable results the courts have painstakingly sought to avoid, then we believe the intent is highly improper and punitive for the very reasons stated by these courts. Thus, no matter what the intent behind including the phrase, we oppose it. We note that the Lent Bill contains no such provision.

C. Interference with EPA's Program Agenda: Schedules for Cleanup and Other Actions; Citizens' Petitions

We fully support rapid site cleanup with a strong and effective program. As elaborated in part I(D) above, we believe that the current Act, reauthorized at such funding levels as EPA needs to run such a program, gives EPA strong tools to carry out such a program. As to the pace of such a program, we believe that the unabating public pressures for waste site clean up, coupled with firm Congressional oversight, are now working -- and will continue to work -- to assure that EPA addresses sites on as quick a basis as is rational. We fear, however, that imposition of arbitrary statutory deadlines for various types of activities and the encouragement of citizens' petitions have the great danger of detracting EPA from its timetables, plans and agenda, and can only have counterproductive effects.

The Bill contains numerous provisions which may impose undue constraints on EPA's ability to plan and act rationally, and to subject EPA to resource-draining response to additional petitions

and/or the defense of citizens' suits. In Section 9004A, EPA would be put under very tight statutory schedules to complete remedial investigations and feasibility studies (RI/FS) at all 546 sites on the current final and proposed National Priorities List (NPL); to complete preliminary assessments of over 16,000 sites on the current "ERRIS" list; and to complete remedial actions at NPL sites. This section apparently even requires completion of RI/FS's for any site that is proposed to be added to the NPL in the future within one year of the date of proposal (§9004A(a)(1)(2)), thus making completely meaningless the notice-and-comment rulemaking process under the Administrative Procedure Act. Similarly, Section 9005(a)(3) requires EPA to expand the current NPL to include 1000 sites under tight deadlines. Sections 9005(b) and 9011 encourage citizens' petitions to assess sites and put EPA under deadlines to respond.

Such arbitrarily-induced haste in the decision-making process may easily produce counter-productive effects. Complex scientific, engineering, and legal decisions must often be made at various stages of each site's cleanup process, and there must be appropriate public participation opportunities in the remedial selection process. Inflexible deadlines can easily cause the shortcircuiting of various stages along the process, and can encourage sloppy decisionmaking.

The Bill would accordingly create a wholly inappropriate and disruptive tension in the program. To the extent EPA drives itself to meet artificially-induced deadlines, it risks making careless decisions which may in some cases be overprotective and may just as easily in some cases be underprotective. In such a

situation, EPA could have great difficulty securing cost recovery in court, for defendant potentially responsible parties would have a field day showing the inadequacy of EPA's decisionmaking process. To the extent EPA wants to take a responsible approach of putting careful protection of public health ahead of meeting an inflexible schedule, it risks the disruptive and resource-draining potential of citizens suits and public criticism for having missed a "deadline." The Lent Bill generally does not appear to include as many potentially disruptive elements along these lines.

D. Delayed Judicial Review Provisions

Section 9006(c)(2) of the Bill would prevent persons subject to an administrative abatement order from seeking judicial review of that order unless and until EPA sought to enforce that order in court, notwithstanding the fact that violation of such an order is punishable by treble damages (§9007(c)(3)) and fines of up to $25,000 per day (§9009(c)). Moreover, this limitation on judicial review would apply despite the facts that (1) EPA has generally issued these orders with hardly any due process at all (usually a quick "right to confer") and that (2) the Bill would ratify this non-due-process system by making clear that notwithstanding the Administrative Procedure Act, EPA can use whatever administrative procedures it, in its "sole discretion, deems advisable" for such orders. §9006(c)(1), (sic).

In the same vein, Section 9004(1) would cut off the rights of potentially liable parties from seeking judicial review of an EPA decision to incur fund expenditures at a site unless and

until EPA sought to recover its costs for such a site in court. This cut-off would apply despite the fact that the Bill would even remove from current law the requirement that the government's expenditures be "not inconsistent" with the national contingency plan in order to be recoverable. Compare CERCLA §107(a)(4)(A) with §9007(a)(2)(A) of the Bill. We note that the Lent Bill contains a similar cut-off with respect to abatement orders (§207), but not with respect to EPA's decisions to expend funds.

Both of these provisions are highly unfair. As to the abatement orders, where any party faces an order requiring massive efforts and expenditures which might take months to complete, possible treble damages, and criminal liabilities, that party should not be cut off by statute from the option of at least attempting to convince a court to review the propriety of the order. The fact that the propriety can be reviewed once EPA brings an enforcement suit is wholly insufficient to protect against abuse. EPA may bring such a suit months or years after an order is issued, during which time a party may be required either to spend millions or to risk the millions (trebled) and criminal liabilities by betting that a court at the enforcement stage will agree with his arguments. This amendment would put an incredibly heavy and punitive club in EPA's hands and cut off any effective way to guard against its possible abuse.

On EPA fund-financed remedy selections, there must again be the right for interested parties to seek judicial review; courts need not grant it in inappropriate circumstances, but a statutory cut-off is highly unfair. Some parties may honestly believe that

a remedy is going to entail unnecessary and counterproductive "gold-plating;" other parties may honestly believe that a remedy is going to be inadequate. Under the Bill, neither type of party even has the opportunity to try to get judicial review of this until after it's done.

We are aware of the concern that the judicial review process not be abused so as to delay the waste-site cleanup program, and we share that concern. We believe that the courts are fully equipped, however, to assure that such abuses will not occur. Even though the law can preserve the normal right for parties to seek judicial review, this does not mean that courts will grant judicial review in inappropriate circumstances. For instance, in the only judicial opinion to address this issue thus far, a federal district court dismissed a suit to review EPA's fund-financed decision while recognizing that such type of review may be appropriate in some circumstances. J.V. Peters & Co. v Ruckelshaus, No. 83-4436, N.D. Ohio, February 17, 1984.

Moreover, granting judicial review does not mean that the cleanup process need be impeded. For instance, since remedies often require a design phase and several months of preliminary work before the "heavy dollar" phase of the cleanup is actually underway, judicial review could proceed on an expedited basis in appropriate cases without delaying cleanup.

E. Creation of Waste-Site Cleanup Program Under RCRA with a "Dangling" CERCLA

The drafters of the Bill have chosen to reauthorize CERCLA by leaving it alone and by adding a totally new set of titles --

patterned in large part after the existing CERCLA -- to the Resource Conservation and Recovery Act (RCRA). If this process were accomplished as proposed, not a word of the current CERCLA would be amended, and it would remain on the books unrepealed. Citizens for generations to come would have to try to work their way through both statutes (the 1980 CERCLA and the new quasi-CERCLA), read many provisions in the two that are identical, many that are somewhat identical, and many that are extremely different, and try to figure out which applies in what situation. The Lent Bill, in contrast, would amend CERCLA.

The most confusion would be produced for those concerned with releases to surface waters. Apparently, such releases would be subject to <u>both</u> resulting laws despite the numerous major inconsistencies between them.

The section-by-section analysis accompanying the Bill leads one to believe that the Bill would not include the current hazardous substance spill program for surface waters. Note that page 1 of the analysis states that the "environment" definition "does not include navigable waters." Moreover, page 1 of the analysis left the clear impression that in the definiton of "facility," all of the current CERCLA definition relating to any "building, structure, installation, pipe, etc." would be deleted and only the portion involving "sites where substances have been stored or disposed" would be left.

Upon reviewing the actual Bill language, however, the matter is not so clear. While the definition of "environment" (§9001(6A)) leaves out the reference to "navigable waters" contained in CERCLA §101(8), it does not expressly exclude navigable

waters. In fact, the Bill's coverage of all "surface water . . . within the United States" clearly includes navigable waters!

Similarly, contrary to the implication of the section-by-section analysis, the Bill's definition of "facility" includes all of the "building, structure, etc." language now contained in CERCLA §101(9), except for the CERCLA parenthetical language referring to pipes into sewers or POTW's. §9001(7).

By focussing on the Bill's language rather than the section-by-section analysis, then, it appears that the drafters' attempts to split-off the spill program were unsuccessful. Spills and other releases to surface waters would be governed by all of the various partially consistent and wholly inconsistent provisions of the 1980 CERCLA and the new law.

Other perplexing questions would arise. A person reading CERCLA §114(c) would conclude that certain state taxes were pre-empted, "except as provided in this Act." A person reading Section 9014(c) of the new law would conclude that the same taxes were not pre-empted "notwithstanding" any other provision. Moreover, if the intent of this strange bifurcation were to move all of the waste-site related provisions from CERCLA over to RCRA and leave only the spill program in the "dangling" CERCLA, why does the Bill leave the post-closure liability provisions for waste sites in the old CERCLA (§107(k)) and not include them in the new RCRA?

F. Citizens Suits

Section 401 of the Bill includes the same "citizens suits" provision that is contained in Section 11(f) of the RCRA

amendments contained in H.R. 2867 (1983). This provision grants citizens a right of action in federal court against operators of current hazardous waste management facilities under RCRA, notwithstanding the operator's compliance with his permit and with all applicable RCRA regulations. This provision would also give citizens a cause of action in federal court to sue past or present generators, transporters, and owner/operators of such facilities to compel site cleanup. As we oppose Section 11(f) of H.R. 2867, we oppose Section 401 of the Bill. The Lent Bill does not include such a provision.

We have already stated our objections to this provision's application to present operators of active sites in our comments on H.R. 2867 and will not repeat all of them here. Perhaps our greatest concern in this respect is the section's potential to undercut the careful permit participation and review procedures prescribed by Congress under RCRA. Interested persons are already entitled to participate in the permitting process. Section 7006(b) of RCRA also gives interested persons the right to challenge the permit in a petition for review in the court of appeals for a period of 90 days. Thus, if an interested citizen wants to object to the terms of a permit, he can do so by participating in the permit proceeding and by seeking review in court. Once the 90-day review period has run, however, the permit is no longer subject to review. The citizens suit provision would completely destroy this carefully designed system. It would permit suits to be brought at any time challenging a permit upon an allegation of imminent hazard.

We are equally opposed to the provisions which would allow citizens to sue past or present generators, transporters and owners and operators to compel or fund the cleanup of inactive hazardous waste sites. This provision would, in many cases, slow down current waste site cleanup efforts and create the potential for conflicting or inconsistent cleanup lawsuits.

Where citizens brought suits concerning sites that were not currently in litigation, it could subject defendants to subsequent inconsistent lawsuits regarding the same site. Citizens could bring suit for the cleanup of a site. The defendants could then agree to settle and clean up the site. EPA and the Justice Department could subsequently decide that cleanup was inadequate for the site. Because the Government was not a party to that original suit, it could bring a second action, regarding the same site, against the same defendants.

Citizens suits under such circumstances might also delay site cleanups. If EPA and the parties responsible for the site were in the process of negotiating an agreement to fund site cleanup, a citizens suit against some of the responsible parties would likely preclude any settlement between the Government and the responsible parties. The responsible parties might easily feel that settling with the government would not be good enough, since the citizens might ask for more.

G. Other Problems and Concerns

The foregoing does not cover all of the elements of the Bill (or the Lent Bill) which we find objectionable. In fact, because

of the length and complexity of the Bill, and the great confusion it causes in considering its relationship to the existing CERCLA, we are still analyzing many other provisions. Our basic point has been that the current CERCLA should not be amended at all save for the fund level and structure, and the foregoing shows how the Bill's attempts to address certain major issues are misguided.

The following are some of the additional points we have uncovered so far on which we have problems or strong concerns:

(1) We oppose limiting the current requirement for 50% state funding at sites owned by a state (CERCLA §104(c)(3)) to sites which are both owned and operated by a state (§9004(d)(2)). Where a state is the owner, its connection with the site is sufficiently great to warrant at least 50% responsibility. Any site owner, whether private or public, has primary responsibility for occurrences on its own property and should not be allowed to shirk that responsibility simply by leasing land to others.

(2) We oppose deleting the phrase "not inconsistent with the national contingency plan" from the analog to CERCLA §107(a)(4)(A) (§9007(a)(2)(A)). This apparently allows the government to recover against responsible parties for any costs it incurs, no matter how wasteful, arbitrary, or unnecessary. Not only would this be grossly unfair to the responsible parties, it would also take away a valuable incentive for the government to avoid wasting fund resources in response activities.

If this amendment is based on a fear that the government will have difficulty sustaining a "non-inconsistency" showing in court, that fear should be put to rest by the court's opinion in

North Eastern Pharmaceutical, supra. The Court there clearly distinguished between the "not inconsistent" language of CERCLA §107(a)(4)(A) (which applies to the government) and the "consistent" language of CERCLA §107(a)(4)(B) (which applies to other parties), and ruled that the burden of proof would rest with parties trying to challenge the government's expenditures. 20 ERC at 1425.

(3) We have substantial concerns about what may be an attempt to expand response authority for "pollutants and contaminants" beyond removal actions for emergencies into much more expensive, long-term remedial actions. Compare CERCLA §101(24) with §9001(19) of the Bill.

The current law carefully distinguishes between "hazardous substances" -- which are substances which have been designated through rulemaking (and which EPA has the right to designate in the future through rulemaking) -- and "pollutants or contaminants," which can be anything EPA may decide to address from day to day on an ad-hoc basis. Numerous provisions of the Bill seem to blur this distinction entirely, and may result in substantial diversions of fund resources away from the inactive waste site problem.

III. Need for Improvement in Industry Tax Mechanisms

A. National Waste Disposal Tax

We are at least encouraged by one aspect of the Bill: its inclusion of a "waste-end" taxing feature. Unfortunately, in its present form, this provision of the Bill is simply not workable. And even more fundamental, both the Bill and the Lent bill are seriously flawed because they are based on a "wet weight" approach.

There are several basic requirements of an effective waste-end revenue system. First, there must be a clearly defined taxable substance. Second, there must be a definite taxable event. Third, there must be an identifiable class of taxpayers. Fourth, there must be a verifiable record of transactions and events to provide the audit trail for enforcement and collection. The effectiveness of a revenue system, as we pointed out in our January 25 testimony, will be increased if that system is related to existing rules and guidelines.

The Bill would impose fees on the disposal of "hazardous substances." In this context, the term "hazardous substances" is far too inclusive and ambiguous for use in a tax or fee system. In addition, the Bill does not contain a clearly defined event for assessing liability for fees or taxes. Section 331(a) of the Bill would impose a fee on the disposal of hazardous substances. By seeking to assess <u>all</u> disposal of an ambiguous assessable substance, the Bill could make literally hundreds of thousands of events and countless taxpayers down to household users subject to potential liability for disposal fees. The fee system thus established would be unadministerable from its inception.

Moreover, even though incineration is specifically exempted from the tax, other forms of treatment -- including common waste water treatment practices -- may be construed to be subject to the tax. If this were the case, one of the main purposes of the waste-end tax system would be defeated, for the incentives for alternate forms of treatment could be greatly reduced.

The major flaw in both the Bill and the Lent Bill is that they would assess fees on waste on a <u>wet</u> weight basis. We

believe that imposing a fee on this basis will create serious inequities and will distort sound waste management practices.

In endorsing a tax on the disposal of hazardous waste January 25, we stressed the need to assess that tax on a dry weight basis. If the tax is assessed as a single rate per dry weight ton of hazardous waste, the tax would be assessed on the actual content of hazardous material disposed or deposited for long-term storage. In this respect, "dry weight" would be actual weight of the material less free water.

Determining dry weight is a common, routine analytical procedure. Dry weight is the weight of a substance after removing the weight of any water in a hazardous waste. One method for doing this is published by EPA in 40 CFR Part 136. Moreover, the post-closure liability tax which is now in place under CERCLA is imposed on a dry weight basis. 28 U.S.C. 4681(b). The experience developed by the Internal Revenue Service in collecting the post-closure tax would apply here.

If the fees are not assessed on a dry weight basis, there will be serious distortions of waste management practices. For example, the fee system under both bills would greatly favor landfill of hazardous waste over other methods of waste disposal. Thus landfilling, the method of waste disposal which has been directly related to the Superfund site problem, would pay significantly lower fees than would other more environmentally acceptable disposal methods.

Our preliminary analysis of the Bill, for example, indicates that landfills would provide only 4.09 percent of the total revenues generated from the disposal fee. On the other hand, if

the disposal fee were assessed on a dry weight basis, landfills would provide in excess of 25 percent of the total revenues generated. Thus, assessing the fee on dry weight would treat all methods of disposal equally and would preserve the strong environmental incentive that is created by a fee on waste disposal.

In contrast, the Lent Bill would present a more workable waste-end system if it were on a dry-weight basis. First, the tax or fee would be imposed on the disposal of "hazardous waste," which is well-defined under existing EPA rules. Thus, there is no need for the Internal Revenue Service or other collecting authority to develop an independent definition for assessing a fee or tax.

In addition, the Lent Bill would impose liability for the fee on the disposal of hazardous waste at a RCRA certified hazardous waste disposal facility or on the deposit of such waste for long-term storage at a RCRA-certified long-term hazardous waste storage facility. This is a specific assessable event. Moreover, treatment of hazardous waste is properly exempted.

The fee created under the Lent Bill would be imposed on the owner or operator of a RCRA certified hazardous waste disposal facility or long-term storage facility. Thus, the class of persons who would be liable for the fee is limited in number. Equally important, the new fee would apply to fewer than 5,000 payers who are already identified under the existing Superfund tax system.

Since the Lent Bill imposes the fee on "hazardous waste," that fee is already linked to a feasible and effective reporting

system. The established manifest system under RCRA tracks hazardous wastes transported to storage or disposal sites and the site operating log maintains records of what is disposed. On-site storers and disposers are also subject to record-keeping requirements. Thus, the Lent Bill secures the certainty of an established reporting and audit system.

Finally, neither bill is sufficiently clear with respect to the treatment of long-term storage. Both bills would assess the fee after the wastes have been in storage for more than one year. There are instances, however, when it can be determined from the facts and circumstances surrounding the deposit in storage that it is probable that storage will exceed one year. In those instances, the liability for payment of the fee should begin when the waste is deposited for storage.

B. Feedstock Taxes

In our testimony of January 25, we stated that the taxes now imposed on the sale of certain petroleum products, organic chemicals and inorganic chemicals -- the so-called "feedstock" taxes -- are extremely narrow-based. CMA strongly urged that Congress not continue or expand these taxes. As we stated:

> "... the more Congress contemplates adding to the current $307 million annual tax level, the more the current funding mechanism would produce an untenable distribution of the tax burden. In addition, the ability of such a narrow-based mechanism to produce revenues would become strained."

Our initial analysis is that the new feedstock taxes proposed in the Bill would compound the inequities and problems that are inherent in the feedstock tax system by a multiple of at

least four times. While the Bill would expand the base of taxpayers in limited measure to include producers of certain minerals, the overwhelming burden of the new fee system would continue to fall on the chemical and petroleum industries.

The fundamental inequity of the present "feedstock" tax system would be unchanged. While the chemical industry is responsible for approximately half of all hazardous waste disposed in the United States, our members would continue to pay virtually all of the Superfund taxes. The distorted distribution of the burden of these assessments within the chemical industry would continue. The assessments on a small handful of building block chemicals would continue to provide most of the revenues to finance the cleanup of hazardous waste sites created by many other disposers.

These taxes would apply to sales of substances without regard to the volume or hazard of any waste that might result and without consideration of the waste management practices employed. The manufacturer's liability could be limited only by limiting production. And the taxes would increase costs for even those products that do not generate <u>any</u> hazardous waste.

The unfairness of increased assessments on feedstocks have been ignored because many have apparently assumed these assessments will pass through from manufacturer to the purchaser of these products. The Bill does not include any appropriate pass through mechanism to accomplish this end, however. Our current experience with the Superfund tax system is that in the absence of an explicit pass through mechanism in the statute, many downstream users have often refused to bear these increased

Superfund costs. The increased level of the proposed assessments without a statutory pass through mechanism would no doubt increase the users' resistance to bear this burden.

Increasing the level of the Superfund assessments on chemicals and petroleum adds to our difficulties with respect to competition from foreign producers. Because the product costs of foreign producers will not reflect Superfund assessments, the foreign producer will have an advantage for overseas sales over U.S. producers. And in the U.S. market, imported products will not bear the cost burden of Superfund fees to the same extent as products produced in the U.S. Thus, the U.S. petrochemical industry not only would be unable to pass through the increased Superfund assessments, but would be placed at an even greater competitive disadvantage with respect to foreign products.

This is particularly important when one considers the trade setbacks American chemical producers have suffered this past year. For 1983, American chemical producers' annual export sales dropped by $437 million, while chemical imports into the U.S. increased by more than $1.6 billion.

Moreover, taxes of the magnitude proposed in these bills could easily have an adverse impact on capital expenditures and research and development spending in the industry. For example, the Commerce Department estimates that capital spending in 1983 will total $13.69 billion for chemicals and allied products. The proposed new taxes would be a very significant portion of this capital expense budget.

For all of these reasons, it is both unreasonable and unfair to increase and to expand the levels of the existing assessments on petroleum and chemical feedstocks. We urge that this Committee and the Congress continue to seek means to broaden the financing base for the Superfund program.

Mr. BONCZEK. In closing, I would like to thank IBM for the role they played in this particular settlement, and more particularly, Mr. Topol who was instrumental in achieving this settlement.

This concludes my remarks. I would be pleased to answer any questions.

[The statement of Mr. Bonczek follows:]

STATEMENT OF ROBERT R. BONCZEK, DIRECTOR OF SAFETY, HEALTH, AND ENVIRONMENTAL AFFAIRS, E I. DU PONT DE NEMOURS & CO.

Mr. Chairman, I am Robert Bonczek, director of safety, health and environmental affairs for the Du Pont Company. I concurrently serve as vice chairman of the company's Environmental Quality Committee.

CORPORATE ENVIRONMENTAL POLICY

Environmental quality and the highest standards for safety and health have long been of primary importance to Du Pont. It is our policy to:

Comply with all applicable laws and regulations related to safety, health and environmental quality in manufacturing, product development, marketing and transportation activities;

Routinely review products, processes and control facilities as new information becomes available to make safety, health and environmental quality improvements beyond those legally required, where such improvements bear a reasonable relationship to their cost;

Determine that each product can be made, used, handled and disposed of safely and consistent with appropriate safety, health and environmental quality criteria.

CORPORATE WASTE MANAGEMENT POLICY

Du Pont's waste management policy falls under the umbrella of the Corporate Environmental Policy. With regards to waste management, Du Pont:

Strives to minimize the generation of waste to the extent that is technically and economically feasible. In other words, we are committed to recycling or reusing the waste material we generate to the fullest extent possible.

Handles all waste in an environmentally sound manner.

Manages waste material on-site or at other company facilities whenever practicable.

Utilizes treatment options, such as incineration, which result in the destruction of waste, as opposed to containment options whenever practicable.

Continually audits internal practices to assure that company policy and recommended practices are followed.

Prior to doing business, ensures that contractors can properly handle our waste material. Contractor performance is evaluated annually.

Over the last decade or so, Du Pont has refined its policy and practices for managing hazardous wastes. These modifications have flowed naturally from the development and evolution of numerous technological, economic, environmental and regulatory factors.

Despite these longstanding and comprehensive environmental programs, Du Pont has on occasion identified company sites where our past waste disposal practices were not adequate by today's standards. Where there was a health or environmental concern, we voluntarily took appropriate remedial action where necessary.

With respect to cleanup of non-Du Pont sites, we recognized early on that governmental action and funding would be necessary. Consequently, we strongly supported the passage of Superfund legislation. To date, in fact, Du Pont, including Conoco, has paid more than $40 million in Superfund taxes.

DU PONT SETTLEMENT POLICY

Du Pont believes that it is of paramount importance to expedite cleanup efforts at waste disposal sites for many reasons. First, there are environmental concerns: the need to protect health and environment. Second, economic considerations dictate that delayed surface cleanup will result in more expensive subsurface cleanup at a later date. Third, there is the question of subsequent liability. Prompt cleanup will minimize the potential for private injury and damage suits later. And fourth, there are the public relations considerations: these sites are an all too visible "black eye" for industry, the government and all others involved.

It has been Du Pont's policy in dealing with Superfund cleanup to settle if the settlement amount is fair in light both of the level of hazard and our degree of involvement. This presumes that we in fact are significantly involved in a site which may be causing an environmental problem.

In line with this policy, over the last few years we have contributed a substantial amount of money toward the cleanup of a number of sites. The Seymour settlement, the subject under discussion today, was one situation where we believe it was not only proper, but clearly in the public interest, to take the course of action that I will now describe. Had a number of us not participated in a voluntary cleanup, rusted drums might be leaking today and two winters might have passed to further any contamination of groundwater.

DU PONT INVOLVEMENT AT SEYMOUR

During the period 1971 to 1976, Du Pont contracted with Seymour Manufacturing Company to dispose of waste solvents. After Seymour Recycling Corporation took over site operations in 1976, we conducted business with them only briefly during 1978.

Our contracts required Seymour to dispose of our waste materials in such a way that the material was completely destroyed and thus would be prevented from entering the environment as a pollutant. The prescribed method for achieving this result was incineration. I should note that during this time, the site and its incinerator were fully permitted by the state and were deemed capable of properly incinerating our wastes.

We first became aware of any significant problems at the Seymour site in October 1980 when we received a "demand letter" from a U.S. attorney. We promptly began evaluating the problem, as well as the extent of our involvement in the situation. Our representatives then met with the court-appointed receiver to attempt to determine the extent to which Du Pont waste may not have been incinerated and thus was part of the problem at the site. The finding was that no Du Pont waste could be reasonably identified for separate removal.

Then, recognizing that we were only one of the parities potentially responsible for the situation, we met with government officials and various other parties in a sincere attempt to resolve the problem. The overridding concern was that the site had 60,000 deteriorating drums and required immediate cleanup. The surface problem was urgent and the extent of any groundwater contamination was essentially unknown. But if a groundwater problem did exist, it was certain to worsen if the surface was not cleaned up promptly. We all realized that something had to be done quickly.

After lengthy debate, negotiation, proposals and counter proposals, the possibility arose for a group responsible for generating one-half of the waste to expeditiously execute the surface cleanup. The government had estimated surface cleanup to be approximately half of the $30 million cleanup job. The generators negotiated a firm bid for a contractor to do the work for $7.7 million; less than the government's estimate but an amount that proved fully adequate in fact. And the government still had the remaining PRP's (potentially responsible parties) available to complete the total cleanup. In addition, the government also had its pending suit against the parties who we believe were truly at fault (the site owners and operators) and Superfund dollars could be used once Indiana matching funds became available.

From our point of view, certain risks were involved if a significant groundwater problem did not exist. In this case, the non-participating PRP's would not be required to make any payments to clean up the site. The settling parties, on the other hand, would have already paid more than their fair share to accomplish the cleanup.

Despite these questions, Du Pont was and still is confident that our decision to proceed with the settlement was the correct source of action—both for Du Pont and for the public interest. This opinion was corroborated by the extensive public comment and thorough review of the settlement that occurred in the November 1982 consent decree proceedings in the U.S. District Court in Indiana. The Court's December 1982 decision supported the cleanup settlement. I would like to point out that during the proceedings no one even alleged that the cleanup plan was not critically needed and fully adequate. In fact, groups such as Indiana State Board of Health, the League of Women Voters and the City of Seymour all endorsed—even praised—the plan.

Despite the settlement, Seymour remains an open case for Du Pont. Last August, we filed a civil action against both Seymour Manufacturing Company and Seymour Recycling Corporation to recover the money spent by Du Pont as a result of breach

of contracts. First, we believe the disposal companies failed to dispose of our waste in an environmentally safe manner as required by the contracts. Second, we believe they violated the indemnification provision of the contracts, which required the disposal companies to reimburse Du Pont for all loss and expense resulting in any way from any act or omission on their part. In essence, we believe that our Superfund liability was the result of their breach of contract.

I would like to point out that this civil action is a private matter between us and Seymour Manufacturing. In our view, it should not and in fact did not delay the cleanup process. Nonetheless, we are taking the action because in effect we have paid three times over for the disposal of our waste—once to the contractors, once in the cleanup settlement and lastly through our Superfund taxes.

SUPERFUND ADMINISTRATION/LEGISLATIVE

I would now like to address the question of Superfund administration and legislation.

We believe that Superfund is basically a sound piece of legislation. We fully support its reauthorization. However, we believe that its implementation could be improved if EPA adopts policy changes to encourage more voluntary cleanups and if the agency would spend Superfund monies and seek recovery through litigation only where a voluntary approach proves to be unworkable. EPA has expressed support for this approach and we will continue to work with the Agency to encourage further necessary policy changes.

In terms of specific legislative changes, we support continued funding beyond the Act's current October 1985 deadline as part of the reauthorization process. There is time to do this in a thoughtful way because present monies should be adequate through next year, even at an accelerated clean up schedule. We believe that the extent of needed funding is still unclear because of uncertainties regarding the extent of the problem. However, EPA's recent analysis, entitled "Superfund Task Force Preliminary Assessment," should help clarify this matter.

We also believe that a waste-end fee can be a more equitable taxing mechanism than the current feedstock tax.

For a more detailed industry position on reauthorization of Superfund, I refer this subcommittee to the testimony on March 8 by Louis Fernandez, chairman of Monsanto, speaking on behalf of the Chemical Manufacturers Association before the House Subcommittee on Commerce, Transportation and Tourism of the Committee on Energy and Commerce.

In summary, Du Pont is proud of what was accomplished through the Seymour settlement. We are pleased to have been instrumental in making the settlement a reality and, while we feel each site must be treated on an individual basis, hope that future efforts of this type are as successful and well received by the public sector.

Mr. LEVITAS. Thank you very much, Mr. Bonczek. And I think we will get right into those questions. I will try to limit myself in the first go-around in order to give the other members of the subcommittee a chance to get their questions in.

All three of you, and I am sure it was true at the time you were talking about the settlement, operated on the assumption that there was not going to be any cleanup in the absence of some settlement, either because Superfund could not be involved since Indiana was unwilling to put up its 50 percent share, or because there was no more expeditious action that might be taken in any other forum or direction.

And the only reason I am raising this question with you, and I guess, Mr. Topol, you probably were the closest to this—I don't know, maybe Mr. Charla as well and I don't know, Mr. Berman, what your involvement was at this point, but I have immediately two reactions to that. The first is that in your testimony, both of your testimonies, Dr. Chu and Mr. Topol, you make the point you were told there wouldn't be any money coming from the State of Indiana; therefore there wouldn't be any Superfund.

And I, as a citizen, as a Member of Congress, as a politician, find that almost impossible to understand. If the Environmental Protec-

tion Agency, USEPA, had walked out to Indianapolis, IN; called a press conference and said:

> Your friend from the Federal Government is here. We are going to put up $7.5 million or $15 million of our taxpayers' money from Superfund sources to clean up this dangerous, imminent threat to public health here in Indiana, and all we are waiting for is the Indiana State government to pay its 50 percent so we can get started.

I think you would have either seen some response from the State of Indiana or you would have had a new set of public officials at the next election.

And that is just what I think. Now, was there any discussion of that? Mr. Charla, you wanted to respond?

Mr. CHARLA. I would like to respond to that, sir.

I was in shock, as you were, when that was first stated, and it was stated repeatedly throughout the negotiations. And we had some counsel in the generators' steering committee who were members of the Indiana bar. And they had investigated the matter and again came back with that story.

And during the testimony, before the judge in the U.S. District Court, I believe a Mr. David Lamb, an official of the State of Indiana, testified to the fact that Indiana had no money. And he said while they had a mechanism for dispensing the money, there was no money to dispense. And that in his view, it would not be appropriated before the winter of 1983. And if my memory serves me correctly, that he really didn't think, as a practical matter, that those moneys would be available before the spring of 1984. And that really corroborated everything we had heard all through negotiations about Indiana's inability or unwillingness to contribute. And that did cause us concern.

Mr. LEVITAS. Mr. Topol. Do you want to add anything?

Mr. TOPOL. No. I have nothing to add.

Mr. LEVITAS. I appreciate that. That is a very constructive and helpful contribution. I have said this to the officials from Indiana who testified before this subcommittee that when they said they didn't have any money, that what they meant is that they had a different set of priorities. They were spending money throughout this entire period of time for other things. This was just not on their priority list.

Maybe 1981 and 1982 was a different time in history with a different level of public concern and awareness, but I would find it almost beyond belief that a public official, today, would say:

> Let it sit there. We are not going to put up 50 percent of the cost with the federal government coming in with the other half to protect the public from an imminent threat to the public health.

That, I think, was the concensus—that was the case there. That was the first thing.

The second thing is, let's assume that Indiana was, in 1982 unwilling to come up with its share and therefore Superfund could not move—this may be an unfair question, and it may be an impossible question to answer, but I am curious. In my former life I was a lawyer and practiced law and did a good bit of trial work as well. My question is: This case was sitting around for about 2 years. There was litigation that was sort of perking along for 2 years. Suddenly—suddenly or otherwise—in the summer and fall of 1982,

things began to move pretty fast. We'll get into that in a minute, the political implications of it.

My question is: Suppose you had one of these real tough, aggressive lawyers—like yourself, Mr. Topol—on the other side who said:

> We're going to pin you and your clients to the wall if you don't come up and get this thing started. What's more, we have several other options at our disposal. We are going to convene a grand jury and look into this thing.

If there had been a more aggressive, vigorous enforcement action policy at the time, other than the policy that was probably at EPA—and there has been plenty of testimony about the fact that they have changed their policy—do you think something different might have ensued?

Mr. TOPOL. Let me say, Mr. Chairman, in my future life I hope to do something different. But in my present life, I am a trial lawyer in the environmental area. And had the Government gone the litigation route—you all passed a statute in December 1980 which gave certain broad authority to commence litigation—the difficulty is confronting the Government lawyer—because I'm on the other side of the table in these cases——

Mr. LEVITAS. Sure.

Mr. TOPOL [continuing]. He is confronted with 360 generators. And he's got to decide which ones to sue. And a number of them have defenses. For example, IBM obviously went in 2 years earlier and removed all of our barrels. Much of our waste was recycled. There were unique things about the site. For example, much of the waste sitting at the site approximately, 15 to 20 percent was shipped by the owner of another dumpsite in Ohio, the Chem-Dyne site.

The litigation ends up being slow and time-consuming—not because people were stalling or delaying because courts are slow—but because it is complicated, factual litigation. Now, could it have been faster? You know, summary judgment has been tried, but they are tough issues to get summary judgment on. Could it have been moved faster with litigation? My instinct, and it's from the cases I'm involved in, says "No." Instantaneous litigation, filing complaints, wouldn't have resulted in a cleanup. If anything, I find the voluntary cleanups to be more difficult to arrive at after the litigation route is commenced.

So I think it is the difficulty of the inherent complexity of the number of generators, the difficulty of factual issues, that makes that not a very fast route to go.

Mr. LEVITAS. All right. Would you address the other points that I threw out about grand juries?

Mr. TOPOL. Well, I don't, at least to my knowledge, I haven't seen them. If I were the prosecutor, I would think certainly on the part of the generators I haven't seen anything that would rise to the level of something to present to the grand jury. Now, as far as site owners and operators, I don't know.

Mr. LEVITAS. Dr. Chu, I'm going to get to you in just a minute. I did want to follow up one question to the attorneys on the panel.

One of the things that we will do at the end of these hearings is make some recommendations, legislative recommendations, for modifying Superfund. I'm not asking you to speak against your cli-

ents' interests at this point, but it occurs to me that if there were some doctrines spelled out very clearly, of a broad structure, a type of absolute liability or a concept which I think is already in the law—it's spelled out pretty clearly, joint and several liability—that would provide for contribution in matters of this sort. In other words: Are there ways we could change the legal framework to make it a more attractive situation for people to settle early on?

And also, I am thinking about making EPA come forward and lay their cards on the table and say: "This is what we know about it. This is who we think is responsible." In other words, to expedite, through changes in the law of getting down to brass tacks and getting these things done.

Mr. TOPOL. Well, there are two—let me throw out—Art Hedge wants to raise one and then I think I would like to raise the other one.

Mr. HEDGE. My issue is in regard to Superfund legislation. It's really not a legal point, but I do think, as was stated earlier, that encouraging voluntary settlements under this fund would be the thing to do. One tactic that might be used, one modification that might be used is to credit the companies for funds that they expend in a voluntary program before litigation starts.

Mr. TOPOL. And let me raise one other one. And I don't have a specific legislative proposal, but my experience has been that at these sites, many, many of the companies are willing and ready to write a check for what they believe is their share of the liability. The problem is, perhaps because of the complexity of the number of people involved and because of uncertainties as to what ultimate cleanup cost is, nobody can tell them what the amount of their check is. So the result is we end up in litigation. But if it were possible to say, in a sense the joint and several liability contribution has spawned an enormous amount of litigation. Because somebody says: "You're liable for all $30 million here." And the person says: "I'm going to litigate." When somebody says: "We want a check for $1.2 million; or we want a check for $650,000." Then the company will write the check, because the companies don't like to pay lawyers if they can avoid it. And I think that's really, at this point, the real cutting edge of the issue.

Mr. LEVITAS. Mr. Bonczek, you wanted to make a point.

Mr. BONCZEK. Yes. I would like to add something to that. I think Mr. Topol is right on the mark. The problem with the administration of Superfund today has been the threat of joint and several liability. I think companies are prepared to deal with situations where there is a fair-share allocation—but when companies are confronted with joint and several liability situations, and the companies happen to be a deep-pocket, which all of us are, you tend to seek and rely on the legal and factual defenses which all of us have, actually, very good ones in this particular case that we didn't call on.

I think this is one of the situations that occurred in Seymour. There was, in fact, an incentive. You have to have a carrot and a stick. There ought to be a stick for those who don't want to come to the table up front. In this particular case, I think we needed to do things better in the interest of the environment. There needs to be an incentive to bring people to the table. And ultimately, there

needs to be a fairness allocation. I think this thing—the settlement that we are talking about—it was an incentive for us to come to the table. We got a complete release. It was fair on a monetary basis. It's in the interest of the environment.

Mr. LEVITAS. Well, I have one more question. Let me say that if IBM and Du Pont keep agreeing with each other, I am sure that Mr. McGrath is going to come to me and wonder if there is a conspiracy of some sort. But I wouldn't speculate on that.

Let me conclude my first round with this question given to the specific situation of the cleanup—and we are going to be getting into what is a cleanup later on. Yesterday we heard from Dr. Hirschhorn of the Office of Technology Assessment about the cleanup of surface waste problems at Seymour. And one of the points that he made was that initially EPA had indicated that the soil at that site was to be removed to a depth of 5 feet at a cost of about $5 million. And that without any technical or other scientific basis, that a decision was made to remove about 1 foot of soil only from certain areas. I believe the testimony said that this would be about 58 percent of the total site area. So that, on net, only about 15 percent of the soil originally intended for removal was actually removed, and that this cut the cleanup cost by approximately $4.4 million from what it would otherwise have been.

And what I am getting at is that the scope of the work of the cleanup that was to be done by EPA—if it had used pro rata settlement money, would it have been different from what you hired Chemical Waste Management to perform? And would it have cost about $4.4 million more? And would it have removed more of the contaminated soil? What I would like to know is how was that decision made? And who made it?

And let me just make one other observation so you'll have it before you. According to a September 7, 1982 memorandum, which I think is already part of the record—I will make it part of the record without objection—September 7, 1982 memorandum of the Environmental Protection Agency from Mr. Burroughs to Beverly Kush, who was the on-site supervisor at Seymour, which will, without objection, be made a part of the record. It is one of those documents we were finally able to get from the EPA.

He says the reason the changes were made were as follows: "Soil excavation—IBM, Bob Morris, indicated that the site excavation plan would be modified based on an updated aerial photograph of the facility." Now, in other words, the technical basis for the change of the quantity of soil was a photograph. And the benefit was that it would save settling parties some $4.4 million. So if anybody can explain why that decision was made, other than the reason I have just given, please do.

Mr. CHU. I would like to give it a try since I was one of the technical people involved. First, I have never seen any justification for 1 foot, 5 foot, 10 foot, 15 foot—any figure we get. We get back to the basic issue that was raised by Dr. Hirschhorn yesterday. No one knows how deep. As a subcommittee chairman for waste disposal sites for the American Society for Testing and Materials, 2 years ago, I tried to organize a task force. And I sent an invitation letter to Dr. Hirschhorn and many other experts in this field. As of now, we still don't have this "How clean is clean?" issue resolved.

I have never seen Dr. or Mr. Biro's memo, so I do not know his basis for 5 foot. The 1 foot was an arbitrary determination and this 1 foot might have left contaminated soil, but based on whose opinion of what is contaminated soil. So in order to reach the point, what is the level of visibly contaminated soil, the photograph was used. And everyone agreed the area for removal and eventually everyone, including the Government, agreed and that was taken off.

And I don't believe I have a good answer for how clean is clean for you. And basically, I have to point out this 1 foot that was removed was something we all agreed to do and we did.

Mr. LEVITAS. Well, I appreciate your answer. It doesn't answer the question, however.

The only thing I know, from this memorandum and from what Dr. Hirschhorn said yesterday, which you have just said, Dr. Chu, is that someplace along the line, after EPA said 5 feet, somebody said 1 foot, and apparently that is arbitrary. It could have been 1 meter, or, as I said yesterday, anything else. I am at a loss to understand what would be accomplished, other than the saving of $4.4 million, by going 1 foot.

What about, you know, 2 feet 6 inches?

Mr. CHU. Sir, the less you remove, the less material has to be shipped to another place. And there had been some information from consultants in the previous report that I mentioned, indicating the soil has higher absorption and capability for the minerals. For organic compounds—I did my dissertation in biodegradation and many compounds are biodegradable. It's just the time and degree, whether it's biodegrading in 1 day or whether biodegrading in 10 years. So, all this consideration was there.

One option, of course, is no soil removal at all. And that was the one I was supporting; not just because of cost. Because I did not have any information to say how much soil needed to be removed.

Mr. LEVITAS. That would have been a more logical way.

Mr. CHU. Yes. It would have been logical. But of course, the agency believes something has to be removed, and so we agreed on this visibly contaminated soil without the definition on what is visible, what is contaminated.

I suggested we use UV for analysis or whatever, and then we said, well, that was too complicated, maybe we'd just place a photograph and we would agree which area has to be removed. It does point out a problem; that is, in future actions how are people going to determine what has to be removed? And I really hope that technicians like me, we can work together, get something out and, hopefully, soon.

Mr. LEVITAS. Thank you, Dr. Chu.

I now will recognize my colleague, the gentleman from New York.

I might, just before I turn loose, say that in your testimony you've said that the reason GM selected—and IBM made the same statement, and so did Du Pont—the Seymour Recycling Corp., was because it was not a landfill, but rather, it was a recycling-incinerator facility. Obviously it became more than a recycling center, it became a dump; it became a hazardous waste dump by 1977–78. And one of the questions we're going to get into is: What responsibility do the generators have to continue to make sure that the

place where they are sending their stuff is what it is supposed to be and is performing appropriately?

Mr. Molinari.

Mr. MOLINARI. Thank you, Mr. Chairman.

In listening to the oral statements and reading the written testimony, I notice some similarity. This leads me to ask whether you gentlemen reviewed with each other the type of testimony that you were going to give today?

Mr. HEDGE. No. Not on the part of IBM.

Mr. CHU. No. Not on the part of GM.

Mr. BONCZEK. We had a chance to look at each other's statements last night, after they had already been submitted to the committee.

Mr. CHARLA. We made no changes.

Mr. MOLINARI. Then you did review them.

Mr. HEDGE. Not on the part of IBM. No changes were made.

Mr. MOLINARI. Let me ask you a question, Mr. Hedge.

Why was IBM reluctant to testify before the subcommittee?

Mr. HEDGE. Well, we were interested in finding out from the committee, Mr. Congressman, what its purpose was and what the committee was looking for in hearing from us. We had been reading for several months from papers the comments about how this was a very favorable deal and so forth and so on for the 24 generators. I wouldn't say it was reluctance; it was trying to understand what purpose we would serve and how we would help the process and what it would mean to IBM. I think we were convinced and reached a determination, in the final analysis, that we should testify.

Mr. MOLINARI. I would have thought that you would have quickly reached that conclusion in order to give your side of the picture and to defend the accusations that had been made against you and the others in the newspaper.

I have received a number of phone calls from a representative of your company who wanted to see me. My own practice is not to see a prospective witness before the hearing. The message I got was that if I would not see him, then IBM might not testify. I think Mr. Levitas might have received similar phone calls. It puzzled me, because I couldn't understand why anybody would be reluctant when they have the type of testimony to offer that you have submitted here.

Mr. HEDGE. Well, we are proud of our story, as we told you; but I think we were trying to understand what, if you'll excuse the word, the environment would be and what we could contribute. I think we became convinced that we could contribute, and that's why we're here.

Mr. MOLINARI. Well, we're happy that you're here, needless to say.

I am impressed by a statement that you make on page 4 of your testimony that "our policies emphasize the importance of being continuously on guard against adversely affecting the environment and seeking ways to conserve natural resources." I think your testimony, at another point, indicated that by late 1977 you began to experience some difficulties at the site and then, in March 1978, be-

cause of that concern, you obviously showed good judgment by stopping shipments to the site.

Now, having that perception, did you go further and notify the Environmental Protection Agency or some of the other corporations that were shipping to the site of your concerns, if, in fact, there's such an emphasis on the part of your company for concern for the environment?

Mr. HEDGE. I cannot precisely answer that, Congressman. I do not know whether we did or not.

Allan?

Mr. TOPOL. I do not have any knowledge that IMB did, Congressman.

Mr. MOLINARI. But if IBM did, I take it from your background that you would have been the individual from the company that would have made the notifications, would you not?

Mr. HEDGE. Not directly, Congressman. One of our technical people would have been visiting the site, for example, if we saw something, and their direct management might, indeed, contact the local officials. And that might have been done in this case. I could certainly check that for you.

Mr. MOLINARI. I would hope that as a situation like this arises in the future with any corporation, small or large, that such information would have been called to the attention of other corporations.

Mr. HEDGE. It is our general practice to do that, and we interface on a voluntary basis with officials when we see problems like that. I do not know precisely who did that or when, or if they did it in Seymour; but as I said, we will respond to that for you.

Mr. MOLINARI. Fine.

Mr. Bonczek.

Mr. BONCZEK. Thank you, Mr. Congressman.

I think there is a law on the books right now—a provision called TSCA § 8(e)—which requires any corporation that gets knowledge that there is substantial environmental or health risk out there that isn't already known by the Government, to make notification to the Government. A situation like Seymour, had the Government not been involved, would have been covered. I might add, however, that the Government—EPA—was involved and did know what was going on there. Any of us would have had the legal obligation under today's law to make such notification, if EPA had not been aware of this.

Mr. MOLINARI. Mr. Bonczek, in your statement you indicate, that you make annual evaluations of a site.

Mr. BONCZEK. Yes, sir.

Mr. MOLINARI. I am puzzled as to why it was that back in 1977, IBM, through their monitoring process, observed difficulties at the site and obviously showed good judgment in stopping further shipments in March 1978. Your company was doing some monitoring of its own and making annual evaluations of the site. But why did it take you until 1980 to become aware of the fact that there were problems at the site? Is there something that you do differently than IBM.?

Mr. BONCZEK. Yes, there is something that happens differently than what you perceive; that is, that we terminated our shipments to the site in 1976. And we had one more shipment in 1978, which

was a shipment of high Btu organic waste from our east Chicago plant, which we received special permission from the State of Indiana to send to the site because it had such a high Btu value that it would help them to incinerate the other wastes that were on site. And after that single shipment, we terminated any relationship with that site, completely. So, our initial shipments went from 1971 to 1976, stopped, with special permission to come in with one shipment in 1978.

We had a certification letter from Indiana to that degree.

Mr. MOLINARI. You received the letter in 1978?

Mr. BONCZEK. Yes, sir. We'd be happy to submit that for the record, if you like.

Mr. MOLINARI. I'm going to ask one more question, and then allow my colleagues an opportunity to ask some questions before they may have to leave.

The question that I would just throw out to all of you: Having gone through all you did in Seymour, knowing what you know today, if you were faced with a similar problem would you enter into a similar agreement today?

Mr. HEDGE. Yes.

Mr. CHU. Yes.

Mr. BONCZEK. I would also answer yes, but I think there are some factual differences here that might be relevant. I think at the time Seymour was operating, causing some problems, there were two legislative actions on the part of our Congress that were not yet a viable entity. One was the RCRA—Resource Conservation and Recovery Act; the other one was Superfund. I think as to the settlement, per se, we'd all go through the same mind set and do the same thing. But I think the site, per se, would have been operating a lot better under today's standards because there are performance-based standards that would be applicable, too, under RCRA, and there are also financial viability requirements that the site would have to meet, both of which would, I think, contribute to resolving the problem that you perceive existed at a particular point in time.

Mr. MOLINARI. Why was there opposition on the part of some of the settlers to a consent decree, Mr. Topol?

Mr. TOPOL. The feeling among some of the generators was that if we went the consent decree route, what would occur is there would be—or there might be—a protracted court hearing, and that we wouldn't be able to get on with the cleanup; we would miss the winter deadline. Our negotiations really reached a conclusion just the day before the October 26 submittal; it was October 25. And the feeling was that submitting it to a court, a court might not move quickly enough on its approval process, which was necessary; we might miss that winter of 1982-83, whereas, with the agreement, we didn't need court approval and that was the view of some of the generators. It was not the unanimous view, it was some of the generators.

Mr. MOLINARI. Identify, if you will, the policy concept of the consent decree.

Mr. TOPOL. My recollection is that the Western Electric Co. preferred to have a simple settlement agreement. They were having difficulties with Judge Green on a consent decree hearing that was

certainly protracted in the District of Columbia. There were others in the group that wanted a consent decree, such as IBM; they wanted it specifically because they felt that it would permit the kind of court review to let a court look at it and say, "This is in the public interest," which might avoid any kind of problems thereafter.

Mr. MOLINARI. And in your judgment as an attorney, does that afford additional legal protection to the settlers in having a consent decree?

Mr. TOPOL. Absolutely. That is why I was in favor of it. I wanted to have a court look at it in an open public hearing where anybody who wanted could participate. It did provide additional protection and led to the court's blessing, yes.

Mr. MOLINARI. Mr. Charla.

Mr. CHARLA. In all candor General Motors was one of the generators that did oppose the consent decree concept during the latter part of the negotiations. And our primary concern was one of speed. We really wanted to get the cleanup started before the hard winter weather set in. And I think the consent decree worked out all right, because the judge did act expeditiously. But we were very concerned that the court hearing process could have taken up to 6 months and you would have been facing higher prices and further deterioration of the site.

Mr. MOLINARI. Thank you, Madam Chairman.

Ms. FERRARO [presiding]. Mr. Hedge, on page 3 at the bottom of your testimony, you have a corporate policy statement covering your objectives for the environmental area, and you also have a number of corporate facilities practices which you update. Then you go on to highlight that in the next several pages. I would like to ask you to submit copies of those to the subcommittee to make them part of the record.

Mr. HEDGE. Certainly.

Ms. FERRARO. The same request to Mr. Bonczek and Mr. Chu, if you would be good enough to make your respective policies and practices available to the subcommittee we would make them part of the record as well.

[Information received follows:]

IBM Corporate Policy

Number 129B
July 30, 1979

SUBJECT: Environmental Protection

IBM will reduce to a minimum the ecological impact of all of its activities. Management in IBM is expected to be continuously on guard against adversely affecting the environment and to seek ways to conserve natural resources.

Although IBM is not in a business which creates severe pollution problems, IBM is committed to:

- Meet or exceed all applicable government regulations in any location.
- Establish stringent standards of its own where government regulations do not exist.
- Attempt to utilize nonpolluting technologies and to minimize energy and materials consumption in the design of products and processes.
- Minimize dependence on terminal waste treatment through development of techniques to recover and reuse air, water and materials.
- Assist government and other industries in developing solutions to environmental problems when appropriate opportunities present themselves and IBM's experience and knowledge may be helpful.

Frank T. Cary

Replaces Corporate Policy No. 129A, dated May 24, 1973

DISTRIBUTION: Lists "A" and "B"

Guidelines (cont'd.)

Health and Safety		
IBM Employees	-	Environmental Health & Safety (CHQ)
Others	-	Product Safety (CHQ)
Pollution	-	RECD Environmental Programs
Product Design Effects	-	EP&T (CHQ)
Manufacturing Processes or Facilities.	-	Manufacturing (CHQ)
Energy	-	RECD Energy Programs

IBM Corporate Facilities Practice

CFP 1404B

February, 1983

1.0 SUBJECT WASTE MANAGEMENT

2.0 OBJECTIVE

This document establishes guidelines to ensure the proper management of both hazardous and nonhazardous waste and shall be used in conjunction with all applicable government laws and regulations.

3.0 WASTE DEFINITIONS

A waste is hazardous if it poses a present or potential hazard to human health or the environment when it is improperly treated, stored, transported or disposed. A waste may be a hazardous waste because of its quantity, concentration or physical, chemical or infectious characteristics.

Examples of hazardous waste include, but are not limited to, the following:

- Plating bath waste
- Solvent wastes
- Solvent based ink and paint wastes
- Industrial waste treatment sludge
- Scrap and waste materials specified by RECD Environmental Programs:

  i) PCB capacitor
  ii) TNF photoconductor
  iii) Cathode ray tubes

Examples of nonhazardous waste include, but are not limited to, the following:

- Sanitary sludges
- Cafeteria wastes
- Paper/cardboard
- Miscellaneous wastes such as wood, glass and plastics

Supercedes CFP 1404A dated October, 1982

4.0 WASTE SURVEY

Facilities Engineering shall prepare a waste survey. This survey should identify the source, chemical constituency, annual quantity, method of treatment or disposal, site of treatment or disposal, and cost (or savings) of treatment or disposal associated with each waste stream generated; hazardous and nonhazardous.

The survey should be completed annually and submitted as part of the Environmental Master Plan Annual Report, in accordance with CFP 1502.

5.0 WASTE MANAGEMENT PLAN

Upon completion of the Waste Survey a plan shall be established to ensure the proper management of waste. The Waste Management Plan shall address both hazardous and nonhazardous waste in at least the following areas:

- SOURCE INVESTIGATION/WASTE REDUCTION
- WASTE COLLECTION
- WASTE SAMPLING AND ANALYSIS
- WASTE, RECYCLE, TREATMENT AND DISPOSAL OPTIONS

The Waste Management Plan shall be included in the Annual Environmental Master Plan, in accordance with CFP 1502.

5.1 SOURCE INVESTIGATION/WASTE REDUCTION

Each source of waste shall be examined. Methods should be considered to:

(a) Reduce the volume of waste being generated, and
(b) Maximize the volume of waste available for recycle.

5.2. WASTE COLLECTION

Waste collection systems and practices shall be examined. Methods should be considered to:

(a) Segregate incompatible wastes,
(b) Segregate recyclable wastes,
(c) Consolidate off-site shipments of compatible wastes.

5.3 HAZARDOUS WASTE SAMPLING AND ANALYSIS

To ensure the proper treatment storage and disposal of hazardous wastes a Hazardous Waste Sampling and Analysis Plan shall be prepared. The plan shall comply with the following:

(a) Before a hazardous waste stream is treated, stored or disposed, either on or off-site, a representative sample of the waste stream must be analyzed according to applicable government standards. If standards do not exist, methods described in CFP 1405 shall be used. The analysis should, as a minimum, contain all information necessary to properly treat, store or dispose of the waste. (See Appendix A as a guide).

(b) Analyses must be repeated as necessary to ensure that they represent the current waste stream composition.

5.4 WASTE TREATMENT AND DISPOSAL OPTIONS

All waste streams (hazardous and nonhazardous) shall be examined to determine the method of treatment or disposal that will minimize the potential long-term adverse environmental impact of the waste. Waste management options available are, in order of preference:

- RECYCLE/REUSE/RECLAMATION
- INCINERATION
- DETOXIFICATION
- SECURE LANDFILL/DEEP WELL INJECTION
- SANITARY LANDFILL
- ALTERNATE METHODS

5.4.1 RECYCLE/REUSE/RECLAMATION

Waste streams that are suitable for either material or energy recovery shall be recovered where feasible.

5.4.2 INCINERATION

Waste streams that are not suitable for recycle/reuse/reclamation but contain organic material suitable for incineration shall be incinerated.

Incineration is an acceptable disposal method for nonhazardous solid waste.

5.4.3 DETOXIFICATION (i.e. - PHYSICAL, CHEMICAL, BIOLOGICAL OR SOLAR TREATMENT)

Hazardous waste streams that are not suitable for recovery or incineration but contain materials suitable for detoxification shall be appropriately treated.

5.4.4 SECURE LANDFILL/DEEP WELL INJECTION

Hazardous waste streams that cannot feasibly be recycled, incinerated or detoxified shall be disposed of at either secure landfill or deep well injection disposal facilities.

5.4.5 SANITARY LANDFILL

Sanitary landfill disposal for nonhazardous solid wastes is an acceptable disposal method.

5.4.6 ALTERNATE METHODS

Any hazardous waste treatment or disposal method other than those described above must be reviewed and approved by RECD Environmental Programs prior to use.

5.5 HAZARDOUS WASTE VENDORS

All hazardous waste recycling, treatment, storage or disposal not done on site shall be done by corporate approved vendors and shall be done under corporate contracts.

RECD Environmental Programs and Corporate Purchasing are responsible for approving hazardous waste vendors and establishing corporate contracts, respectively. RECD will ensure that each approved facility is audited at least annually.

5.5.1 HAZARDOUS WASTE STREAM REVIEW

A hazardous waste description form must be completed for each hazardous waste stream requiring off-site recycling, treatment, storage, or disposal (see Appendix A). The form shall be

reviewed by location Environmental Engineering to ensure that the proper treatment methods and vendors are being employed. Completed waste description forms are to be forwarded to RECD Environmental Programs for review prior to the initial shipment of the waste streams.

A purchase order for waste treatment, storage, disposal or recycling services shall not be executed unless location Environmental Engineering has reviewed and RECD Environmental Programs has approved the waste description form for the waste stream.

5.6 CONSTRUCTION SITE WASTE

RECD shall ensure that all wastes generated on RECD construction sites are handled in an environmentally sound manner. Project managers shall involve RECD Environmental Programs to determine (1) those wastes which are hazardous, and (2) the proper disposal method to be utilized.

Facilities Engineering shall ensure that all wastes generated on locally managed construction sites are handled in an environmentally sound manner.

(NOTE: Questions on the CFP above should be directed to RECD Environmental Programs.)

END

"-107

APPENDIX A

IBM

IBM WASTE DISPOSAL AGREEMENT

SCHEDULE A

WASTE DESCRIPTION

I. GENERAL INFORMATION

A. IBM Information

1. IBM Location _____ IBM Division _____
2. IBM Location EPA ID No. _____
3. IBM Location Address _____
   _____
4. Bill-To Address _____
   _____
5. IBM Location Contact
   Technical _____ Title _____ Phone ( ) _____
   Purchasing _____ Title _____ Phone ( ) _____

B. Waste Disposer Information

1. Disposer Company _____
2. Disposer Location/Address _____
   _____
3. Disposer Location EPA ID No. _____
4. Disposer Contact _____ Phone ( ) _____

C. Waste Stream Information

1. Waste Name _____
2. IBM Waste Stream I.D. No. _____
3. Disposer Waste Stream Code _____
4. Process Generating Waste _____

D. RECD Review

1. Name _____
2. Signature _____
3. Date _____

SCHEDULE A (cont.)

II. WASTE STREAM PROPERTIES

A. Physical State: Solid ☐ Semi-solid ☐ Liquid ☐
Powder ☐ Other _____

B. Phase Layers: Bilayers ☐ Multilayers ☐ None ☐

C. Organic ☐ Inorganic ☐ Both ☐

D. Solids: Total by weight _____
Total Dissolved _____ (ppm or by weight)

E. Specific Gravity: _____

F. Viscosity: _____

G. pH: _____

H. Flash point: _____ °F Closed Cup ☐ Open Cup ☐

I. BTU per Pound: _____ Ash Content: _____

J. Organic Chlorine: _____ Organic Sulfur: _____

K. Does this Waste Stream Contain Cyanide ? Yes ☐ No ☐
If Yes, Specify: _____

L. Pathogenic, Etiologic Content ? Yes ☐ No ☐
If Yes, Specify: _____

M. Does Waste Contain a Pesticide ? Yes ☐ No ☐
If Yes, Specify: _____

N. Does Waste Contain PCB's ? Yes ☐ No ☐
If Yes, Specify: _____

107

SCHEDULE A (cont.)

Account for 100%; give ranges where waste composition varies. Vendor shall verify data to ensure safe treatment and disposal.

III. WASTE COMPOSITION

A. Organic Components: (indicate whether % or ppm, with ranges)

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

B. Inorganic Components: (with % ranges)

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

C. Heavy Metals: (with ppm ranges).

Dissolved	Suspended	Dissolved	Suspended
Ag _____	_____	Mn _____	_____
As _____	_____	Ni _____	_____
Be _____	_____	Pb _____	_____
Cd _____	_____	Sn _____	_____
Cr _____	_____	Zn _____	_____
Cu _____	_____	Other _____	_____
Fe _____	_____	Other _____	_____
Hg _____	_____	Other _____	_____

D. Acids, Bases, Oxidizers

H_2SO_4 _____	%	NaOH _____	%
HCl _____	%	NH_4OH _____	%
HF _____	%	KOH _____	%
HNO_3 _____	%	$Na_2S_2O_3$ _____	%
Cr_2O_3 _____	%	Other _____	
$KMnO_4$ _____	%	Other _____	
$K_2S_2O_8$ _____	%	Other _____	
H_3PO_4 _____	%	Other _____	

107

SCHEDULE A (cont.)

IV. HAZARDOUS CHARACTERISTICS

A. Toxicity Information Low ☐ Medium ☐ High ☐

Inhalation ☐ Dermal ☐ Oral ☐

B. Is waste a hazardous material as defined by DOT pursuant to the Hazardous Materials Transportation Act ? _____

1. DOT Shipping Description: _____
2. DOT Hazard Class(es): _____
3. DOT ID Number from Hazardous Materials List: _____

C. Does this waste contain any "Hazardous Substance" as defined by EPA pursuant to Sec. 311 of the Clean Water Act ? _____
(See 40 CFR 116) – If so, please note the following:

1. Name of each hazardous substance present in the waste and corresponding hazard category (A, B, C, D, X): _____

_____

D. Is this waste a hazardous waste as defined under RCRA ? Yes ☐ No ☐

1. If Yes:

Listed Waste Description: _____
Listed Waste Number(s): _____
Hazard Criteria for Which Waste is Listed: _____
Hazard Characteristic:

Toxic ☐ Ignitable ☐ Reactive ☐ Corrosive ☐

SCHEDULE A (cont.)

V. TRANSPORTATION AND DISPOSAL INFORMATION

A. Method of Treatment/Disposal:

1. Incineration ☐
2. Secure Landfill ☐
3. Co-Disposal ☐
4. Aqueous Treatment ☐
5. Solar Evaporation ☐
6. Solvent Recycle ☐
7. Other (specify): _____

B. Quantity /Shipping Requirements:

1. Anticipated Volume: _____ Gals. ☐ Tons ☐ Cu. Yds. ☐ Drums ☐
   Other ☐ _____
   Per: Day ☐ Week ☐ Month ☐ Year ☐ One Time ☐
2. Transportation Equipment Required: _____
3. Placarding Required: _____
4. Service/Scheduling Requirements: _____
   _____

C. Price: $ _____

D. Comments: _____
_____

PERSON FILLING OUT THIS FORM :

Name: _____ Title: _____ Phone: _____ Date: _____

IBM Site Review	Supplier Review	IBM Purchasing
By: _____	Vendor: _____	By: _____
Title: _____	By: _____	Title: _____
Date: _____	Title: _____	Date: _____
Signature: _____	Date: _____	Signature: _____
	Signature: _____	

GMS 81
PRINTED IN U. S. A.

GENERAL MOTORS CORPORATION

RECEIVED
W.E. JOHNSON
MAR 15 1978

SUBJECT TOXIC SUBSTANCES CONTROL POLICY NO. 1347

TO General Managers of Divisions
General Operating Officers
Group Executives
Staff Executives
Heads of Staff Sections

DATE March 10, 1978

General Motors Corporation has a long-standing commitment to protect the health and well being of its employes, the general public, and the environment. At this time, it is appropriate to state additional guidelines applicable to all General Motors operations to accomplish these objectives.

It is the policy of General Motors Corporation to establish and properly maintain at all times programs and procedures which assure that all chemical substances and materials are safely transported, handled, used, stored, and properly disposed of after use.

Federal and State laws dealing with employe safety and health, consumer protection, environmental protection, and transportation safety, have been supplemented by the enactment in 1976 of the Toxic Substances Control Act and the Hazardous Materials Transportation Act of 1975. The Toxic Substances Control Act authorizes the Environmental Protection Agency (EPA) to screen all new chemicals and significant new uses of chemicals, and to make regulated chemicals, new and old, unavailable for production use. Further, the Toxic Substances Control Act requires notification to the EPA, in advance, of intentions to manufacture a new chemical or to process a chemical for a significant new use as defined in the regulations. The Hazardous Materials Transportation Act is administered by the Department of Transportation (DOT) and requires shippers to identify, label, properly package, select an approved mode of transportation, certify compliance to the Act prior to shipping hazardous materials, and report specific incidents involving hazardous materials shipments as defined in the regulations.

Toxic Substances Control Act

The Procurement, Production Control and Logistics Staff, in conjunction with divisional purchasing units, has the responsibility for obtaining necessary information about chemical substances and materials from suppliers.

Toxic Substances Control Act (Continued)

The Industrial Relations Staff in line with its responsibilities for employe health and safety protection, is assigned the responsibility to compile and maintain a corporate inventory of chemical substances and materials, to coordinate the corporate chemical material control program and provide information and assistance to plants as required.

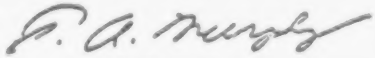
The Environmental Activities Staff will coordinate all reporting and has overall responsibilities relating to the EPA's administration of the Toxic Substances Control Act.

Each General Motors unit will be required to conduct an inventory of all chemical substances and materials, productive and non-productive. Guidelines for the inventory system as well as various evaluation and reporting procedures will be issued by the respective staff activities involved in this program.

Hazardous Materials Transportation Act

The Procurement, Production Control and Logistics Staff has the responsibility to coordinate the administration of existing procedures designed to ensure compliance with the Hazardous Materials Transportation Act including coordination of any reporting to the DOT. The complete requirements and procedures related to this Act are included in Section 24 of the General Motors Traffic Manual.

The final responsibility for implementation of this policy relative to the Toxic Substances Control Act and the Hazardous Materials Transportation Act rests with the divisions and operating units. All units, with the guidance of the appropriate corporate staffs, should evaluate all productive and non-productive chemical substances and materials prior to use or shipping to ensure compliance with these new laws, and institute prompt corrective action in any area not meeting the intent of this policy. The effectiveness of local control programs will be audited in accordance with the General Motors audit procedures.



Chairman

GENERAL MOTORS CORPORATION

ASSIGNED
W.R. JOHNSON
FEB 2 1979

SUBJECT GM ENVIRONMENTAL POLICY NO. 1368

TO General Managers of Divisions
General Operating Officers
Group Executives
Staff Executives
Heads of Staff Sections

DATE January 31, 1979

Over the years, efforts have intensified to study and control the impact of GM products and plants on the environment. It has long been recognized that, where practicable, our products must be made to be consistent with environmental needs as part of our responsibility.

The environmental movement has resulted in a significant amount of legislation since 1970. The Clean Air Act has been amended twice, the Noise Control Act has been enacted, and the Water Pollution Control Act has been passed and amended. Passage of the Resource Conservation and Recovery Act, the Energy Policy and Conservation Act, and most recently the Toxic Substances Control Act combine to allow the federal government to have comprehensive jurisdiction over virtually all pollutants. There is now control prior to, during, and after the use of products. As a result, regulatory agencies are taking a more comprehensive approach to enforcing environmental laws, thereby creating additional pressures on industry for coordinating planning, development, control and reporting. Environmental constraints are directly influencing our product design, product operation, marketing, plant siting, processes used and waste disposal.

It is now considered necessary for GM to develop a more formal and comprehensive Environmental Policy to serve as an operational guide, and as a yardstick against which we can measure our efforts. Existing GM policy letters regarding the specific areas of air and water pollution control, industrial waste, noise and toxic substances remain in effect. The following key points are the framework of GM's Environmental Policy.

> First and foremost, GM Divisions are responsible for, and must comply with environmental laws and regulations in the design, manufacture and sale of our products, as well as during their use and disposal. Regarding locations that are not meeting a code or regulation, there

should be positive correctional efforts initiated as soon as possible. The Legal Staff and Environmental Activities Staff should be promptly informed of such situations, and of correctional plans and actions.

Wherever GM identifies an environmental problem, appropriate action should be taken. In the product area, this includes emissions, noise, odors and safety. Regarding the plants, this includes air and water pollution, chemical wastes, odor and noise both outside and inside the plants.

GM personnel must continually assess and attempt to understand the actual environmental impact of GM products on the public, and of our plants on the communities in which they are located. This includes the human health, safety and aesthetic needs of the community, as well as the balance of economic costs and environmental benefits. There should be a concerned effort to collect and study health effects data on the various pollutants, and to develop our own data where possible.

Conservation must be a major goal. We must view our use of materials, including water, as a depletion of natural resources; thus, we should use these resources as efficiently as practicable. Product design and manufacturing methods should consider the recyclability aspects of materials.

GM scientists and engineers should assume a leadership role in developing process and control technology for pollutants, as well as developing long-range goals and programs. Stress should be placed on avoiding pollution at the source, rather than cleaning it up. GM should also keep abreast of new technology in the search for materials, designs, processes and facilities that are less polluting. Technology developed in one location should be jointly shared with other appropriate units of the Corporation. GM will not merely shift environmental responsibility to an outside supplier without mitigation of the environmental effect on the public.

GM should participate in the standard setting procedure by making available to legislative bodies and regulatory agencies information concerning our managerial position, technical data on health effects and costs, and operational limitations. If there are situations in which environmental regulations are overly restrictive and not cost-beneficial, GM's position should be put forward in a positive manner. The Environmental Activities Staff was created in 1971 to serve as the technical interface with the

regulatory agencies concerned and to coordinate the increasing amount of technical communication and testimony on environmental and safety issues. The Staff provides technical data in order to be more positive and persuasive in the development of reasonable, practicable and cost-beneficial regulations, and to optimize our relationships with the regulatory agencies.

GM must assure that legal requirements, as well as those self-imposed, are met by means of a reporting and audit program. The Divisions should have their own reporting systems regarding environmental compliance, subject to monitoring by the Environmental Activities Staff as part of its oversight responsibility. The audit mechanism should be so designed to avoid noncompliance occurrences at Corporate facilities.

The intent of this policy is to establish the tone and philosophy for our environmental efforts. In the past, we have tried to develop our products and direct our plant operations in such a manner that we will be regarded as good community citizens. Now we must expand these efforts in order to attain new and higher levels of social responsibility in the growing national community.

F. A. Murphy

Chairman

VP-10172

DU PONT
ESTABLISHED 1802
E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
WILMINGTON, DELAWARE 19898

ENVIRONMENTAL QUALITY COMMITTEE

RECD APR 10 1984

April 5, 1984

U. S. House of Representatives
Committee on Public Works
and Transportation
Subcommittee on Investigations
and Oversight
B 376 Rayburn Building
Washington, D.C. 20515

Ladies/Gentlemen:

In response to your communication dated March 23, 1984 (which we received on March 30), we have reviewed the transcript of the testimony which we gave before the Subcommittee on March 14, 1984. We have noted several grammatical and transcriptional errors on the attached copy of the transcript. Also attached are copies of the following two documents which we referred to in our testimony and promised to provide for the record:

- statement of Dr. Louis Fernandez on behalf of the Chemical Manufacturers Association before the Subcommittee on Commerce, Transportation and Tourism, Committee on Energy and Commerce, U.S. House of Representatives on March 8, 1984,

- E. I. du Pont de Nemours and Company's "Safety, Health and Environmental Quality" policy (1 page) and "Waste Management" policy (2 pages).

The above documents have been labeled Attachment A and B, respectively, and such references have been noted at pages 54 and 78 of the transcript.

If you have any questions, please contact me.

Very truly yours,

Robert R. Bonczek
Director of Safety, Health
and Environmental Affairs

Attach.(3)
RRB:pt

ATTACHMENT B

E. I. DU PONT DE NEMOURS AND COMPANY

EXECUTIVE COMMITTEE

SAFETY, HEALTH AND ENVIRONMENTAL QUALITY

WHEREAS, environmental quality and the highest standards for safety and health have long been of primary importance to the Du Pont Company;

RESOLVED, that this Company as a matter of policy:

1. will comply with all applicable laws and regulations related to safety, health and environmental quality in its manufacturing, product development, marketing and transportation activities;

2. will routinely review its products, processes and control facilities as new information is available for the purpose of making safety, health and environmental quality improvements beyond those legally required where such improvements bear a reasonable relationship to their cost; and

3. will determine that each product can be made, used, handled, and disposed of safely and consistent with appropriate safety, health and environmental quality criteria;

RESOLVED FURTHER, that this Company will coordinate the adoption of this policy by consolidated subsidiaries, who will administer the policy through their line organization;

RESOLVED FURTHER, that this Company will encourage the development of similar safety, health and environmental quality policies for foreign and domestic affiliated companies; and

RESOLVED FURTHER, that each department is responsible for the development and implementation of plans and programs to ensure that its operations comply with the safety, health and environmental quality policy and to assist in promotion of public acceptance of corporate efforts to protect the safety and health of employees, customers and the public and to protect the environment.

Adopted November 24, 1971

Revised November 13, 1981

ATTACHMENT B

WASTE MANAGEMENT

POLICY: IT IS DU PONT POLICY TO MINIMIZE THE GENERATION OF WASTE TO THE EXTENT THAT IS TECHNICALLY AND ECONOMICALLY FEASIBLE, AND TO HANDLE ALL WASTE IN AN ENVIRONMENTALLY SOUND MANNER. TREATMENT OR DISPOSAL WILL BE ON-SITE WHENEVER PRACTICABLE OR AT OTHER DU PONT SITES WITH SUITABLE WASTE MANAGEMENT FACILITIES AS A FIRST CHOICE IF IT BECOMES NECESSARY TO SEND WASTE OFF-SITE.

Procedure and Implementation

A. Worldwide

For those sites where Du Pont has operating control, each department shall:

- Ensure each manufacturing or research site has a qualified waste management coordinator with part- or full-time duties.
- With advice from appropriate staff departments, be responsible for establishing a program at either the local or departmental level to audit internal practices to assure that company policy and recommended practices are followed. In addition, the performance of outside contractors should be audited as appropriate. Audit reports are to be submitted to the Director of Safety, Health and Environmental Affairs by March 31, 1982. Subsequent audits will depend on need.
- Obtain and periodically update data concerning the potential for environmental damage at all Du Pont-controlled sites and contractor sites as appropriate. If a reasonable probability of environmental damage exists, a course of action will be established with assistance of Legal and other appropriate departments.
- Ensure that contractors, including carriers, can handle waste materials in an acceptable manner prior to contractual agreement.

B. U.S. Primarily; Foreign Subsidiaries, Where Appropriate

Each department should:

- Ensure that Materials and Logistics Department (M&L), with appropriate inputs from the involved department, negotiates and executes all orders and contracts for wastes (including trash) which go off-site.
- In the case of foreign subsidiaries, obtain nonobjection by subsidiary management to all contracts for both hazardous and nonhazardous waste disposal. Approval will be obtained from M&L in regions or countries where they have a presence, and their advice will be sought in other areas.
- Have procedures for following up on the status of Du Pont generated waste after termination of outside contracts.

C. Cleanup of U.S. Contract Hazardous Waste Sites

- In dealing with government Superfund cleanup demands, Company policy is to contribute to the cleanup of a site where it can be established that we are involved at the site, our wastes were causing an environmental problem, and the amount of contribution reflects our "fair share".
- Where environmental damage occurs or is threatened at a site through no fault of Du Pont (e.g., where such damage results from failure of a contract disposer to perform under his contract with Du Pont), we would consider the contract disposer or the party controlling the site, rather than Du Pont, responsible for remedial action. Du Pont would normally not contribute to cleanup of such a site absent mitigating circumstances, e.g., cleanup would be unreasonably impeded or public relations considerations dictate otherwise. If a claim is made against Du Pont under "strict liability" law such as Superfund, we may be obligated to contribute to a cleanup of the site even though our conduct has been proper. In any case where Du Pont does incur liability as a result of a contract disposer's failure to perform under a contract, Du Pont, absent mitigating circumstances, should vigorously pursue its legal rights against the site owner, contract disposer or other responsible party, to recover monies spent or obtain other necessary relief.
- In general, legal action which could delay cleanup should be avoided.

D. Internalization; Containment vs. Destruction of Hazardous Wastes.

- It is Company policy with respect to hazardous wastes to
  (1) manage waste on site or in other Company facilities, and
  (2) utilize treatment options which result in destruction of waste (such as incineration) as opposed to containment options (such as land disposal).
- This policy should be followed insofar as is reasonably possible even when some additional cost to the Company results. Deviation from this policy should be authorized no less often than annually and only by a vice president or group vice president.
- When no treatment options which result in destruction exist within the Company, preference should be given to the use of outside contractors with such capability as opposed to using Company facilities which result in containment (following the procedures for selection and monitoring of contractors as contained in Guideline II-A in this Manual).
- When existing Company waste management facilities approach capacity operation, priority should be given to the more hazardous wastes.
- For hazardous wastes for which no existing Company facility is available or practicable, Departments individually, or in aggregate, should maintain a current analysis of the most practicable facility which could be built to bring the handling of such materials within Du Pont. Multi-department/multi-site facilities should be considered where appropriate. Strong preference should be given to the utilization of treatment options which result in destruction (such as incinerators) as opposed to containment options (such as land disposal). Authorization of such facilities should be considered annually for decision as to whether or not they should be included in the current capital authorization budget.
- These principles should apply to operations outside the United States but with due consideration to the laws and policies prevailing in the geographic region or subsidiary.

Ms. FERRARO. Mr. Hedge, you also state, on the top of page 4, that the focus of your corporate policies and facilities practices "is on the prevention of environmental damage rather than on remedial activities." How long have those policies and practices been in effect?

Mr. HEDGE. They have been specifically—the first corporate policy statement which set that in motion, Congresswoman, started in 1971. And what that refers to, when I talk about prevention, to give you one example, is double piping of systems that will transport chemicals throughout our semiconductor plants that are used in cleansing. So, we look at that as a prevention activity. The kind of liners that we put on tanks where chemicals are stored and removed from the site, is another prevention item. We spend a considerable amount of money in that particular area with new construction and also with retrofitting of older sites and older plants.

Ms. FERRARO. Could you give us an idea—a round number—of how much hazardous waste IBM generates a year?

Mr. HEDGE. Hazardous waste we dispose of off site is approximately 100,000 tons. That is a U.S. figure.

Ms. FERRARO. How much of that goes into a landfill and how much of that is dealt with by recycling, incineration and detoxification.

Mr. HEDGE. Approximately 55 percent of that goes into landfill, but over half of what goes into landfill has already been treated with some other method, primarily detoxification. In the first stage, about 25 percent is dealt with in terms of detoxification and the remainder is split equally, I think, roughly between recycle and incineration.

Ms. FERRARO. Mr. Chu, could you give us an idea of how much hazardous waste your company generates each year and what proportion you send to landfills, how much you recycle, incinerate, or detoxify?

Mr. CHU. I don't have that information available.

Ms. FERRARO. Could you submit it to our committee for our record?

Mr. CHU. I do not have that information available in my office.

Ms. FERRARO. You do not have that information on how much?

Mr. CHU. We do not collect that information at the present time.

Ms. FERRARO. At all?

Mr. CHU. The one problem we have is a hazardous waste compliance and definition, and certain waste may not be a hazardous waste defined by the Federal Government. So, it could be a long process to collect all of that information. However, EPA requires an annual report of hazardous waste generation by anyone, and the next reporting due is March. And we will have that information possibly sometime in June, if we collect all of this information, and put them together.

Ms. FERRARO. Then at that time would you submit the information to the subcommittee for our record?

Mr. CHU. Yes.

[Information received from Mr. Chu follows:]

REC'D JUL 18 1984
Subcommittee on Investigations
Committee on Public Works
and Transportation

General Motors Corporation
General Motors Technical Center
Warren, Michigan 48090

July 12, 1984

Subcommittee on Investigation and Oversight
B376 Rayburn Building
U.S. House of Representatives
Washington, D.C. 20515

Dear Sirs/Madams:

General Motors Corporation (GM), as a follow-up to our April 2, 1984, letter to you, submits GM's hazardous waste generation data as indicated in that letter.

Very truly yours,

Joseph P. Chu, Ph.D., P.E.
Assistant Director
Plant Environment

Attachment

GENERAL MOTORS CORPORATION

HAZARDOUS WASTE GENERATION DATA SUMMARY FOR 1983

JULY 12,1984

	PLANTS REPORTING	REPORTED TONS/YEAR
NORTH AMERICAN CAR GROUP		
BUICK	1	30,555
CHEVROLET	14	8,620
CADILLAC	3	735
OLDSMOBILE	3	13,420
PONTIAC	2	7,315
SUBTOTAL	23	60,645
BODY AND ASSEMBLY GROUP		
FISHER BODY	24	14,800
GM ASSEMBLY	21	28,780
GUIDE	2	11,145
SUBTOTAL	47	54,725
ELECTRICAL COMPONENTS GROUP		
AC SPARK PLUG	6	3,495
DELCO ELECTRONICS	4	5,540
DELCO PRODUCTS	3	2,860
DELCO-REMY	10	2,840
PACKARD ELECTRIC	4	400
ROCHESTER PRODUCTS	6	2,295
SUBTOTAL	33	17,430
MECHANICAL COMPONENTS GROUP		
CENTRAL FOUNDRY	9	8,700
DELCO MORAINE	3	1,720
HARRISON RADIATOR	6	15,870
HYDRA-MATIC	5	19,975
INLAND	2	2,480
NEW DEPARTURE HYATT	2	1,730
SAGINAW STEERING GEAR	4	21,290
SUBTOTAL	31	71,765

POWER PRODUCTS AND DEFENSE OPERATIONS GROUP		
DEFENSE OPERATIONS	3	2,810
ELECTRO-MOTIVE	7	2,230
SUBTOTAL	10	5,040
WORLDWIDE TRUCK AND BUS GROUP		
DETROIT DIESEL ALLISON	4	1,025
TRUCK AND BUS MFG	10	12,815
SUBTOTAL	14	13,840
MISCELLNEOUS NON MANUFACTURING AND SERVICE GROUPS		
GM BUILDING	1	0
GM PROVING GROUNDS	2	35
GM TECHNICAL CENTER	1	345
GM AIR TRANSPORT	1	0
SUBTOTAL	5	380
SERVICE PARTS OPERATION		
GM WAREHOUSING & DISTRIBUTION	21	2,990
SUBTOTAL	21	2,990
TOTAL	**184**	**226,815**

Inter-Organization

Environmental Activities Staff
General Motors Corporation
General Motors Technical Center
Warren, Michigan 48090

Date July 12, 1984

Subject Hazardous Waste Generation Data for 1983

From M. P. Zdyb

To J. P. Chu

The 1983 hazardous waste generation data for 184 GM facilities have been summarized and provided to you. The following additional information for 17 of the 184 facilities is provided.

1. AC Spark Plug - Wichita Falls, TX
State report does not indicate waste types. The waste types were obtained through telephone communication with plant personnel.

F001 - 5.69 Tons F003 - 0.25 Tons

2. Central Foundry - Defiance, OH
Data obtained through telephone communiction with plant personnel.

D001 - 7.95 Tons F001 - 1.81 Tons

3. Defense Operation - Santa Barbara, CA
Data obtained through telephone communication with State Agency personnel.

Total hazardous waste generated 1983 17.70 Tons

4. Fisher Body - Columbus, OH
Data obtained through telephone communication with plant personnel.

D001 - 2.78 Tons D002 - 10.65 Tons D005 - 1.54 Tons
F011 - 1.05 Tons

5. Fisher Body - Grand Rapids Trim Plant, MI
Data obtained through telephone communication with plant personnel.

D001 - 1.62 Tons D008 - 5.51 Tons

6. Fisher Body - Lordstown, OH
Data obtained through telephone communication with plant personnel.

D001 - 97.00 Tons D008 - 41.00 Tons

7.Fisher Body - Mansfield, OH
Data obtained through telephone communication with plant personnel.

D001 - 22.31 Tons

42-590 O—85——25

8. Fisher Body - Marion, IN
Data obtained through telephone communication with plant personnel.

No hazardous waste generated in 1983.

9. Fisher Body - Pittsburgh, PA
Data obtained through telephone communication with plant personnel.

D001 - 5.82 Tons

10. Fisher Body - Trenton, NJ
Data obtained through telephone communication with plant personnel.

D001 - 132.00 Tons D002 - 53.00 Tons D004 - 667.00 Tons
F005 - 36.00 Tons F006 - 1,710.00 Tons F007 - 9.00 Tons

11. GM Assembly Division - Linden, NJ
Data obtained through telephone communication with plant personnel.

D001 - 32.85 Tons D002 - 2.87 Tons

12. GM Assembly Division - Wentzville, MO
Data obtained through telephone communication with plant personnel.

D001 - 103.00 Tons F006 - 53.00 Tons

13. Hydra-Matic - Toledo, OH
Data obtained through telephone communication with plant personnel.

No hazardous waste generated in 1983.

14.New Departure - Hyatt Bearings - Bristol, CT
Data obtained through telephone communication with plant personnel.

D001 - 812.00 Tons D007 - 913.00 Tons

15. Rochester Products - Sioux City, IA
Data obtained through telephone communication with plant personnel.

D001 - 4.41 Tons

16. Rochester Products - Tuscaloosa, AL
Data obtained through telephone communication with plant personnel.

No hazardous waste generated in 1983.

17. GM Warehousing & Distribution - Martinsburg, WV
Data obtained through telephone communication with State Agency personnel.

D002 - 2.89 Tons D008 - 7.84 Tons F002 - 1.03 Tons

Form Approved 12-31-46

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with pica type. Do not exceed boundaries.

II. GENERATOR'S EPA I.D. NUMBER

T A C

M	I	D	0	8	2	2	2	0	7	5	7	[illegible]	[illegible]
1	2										13	14	15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

III. NAME OF INSTALLATION

G M C M I S S I L E F O R D P R O V I N G G R O U N D
30 69

IV. INSTALLATION MAILING ADDRESS

H I C K O R Y R I D G E A L G M I R O A D S
15 16 45

Street or P.O. Box

M I L F O R D
15 16 41 42

City or Town

M I 4 8 0 4 2
47 51

State Zip Code

Tear out here

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 45

Street or Route number

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

E V E R E T T C A R O L E
15 16 45

Name (last and first)

3 1 3 — 6 8 5 — 6 4 3 5
46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

F. D. Smitheson, Director, GM Proving Grounds — 2-23-84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13A (4-80) Obsolete 11-83

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 8 2 2 0 7 5 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Nelson Industrial Services

X. FACILITY'S EPA I.D. NO.

M I D 0 9 8 0 1 1 9 9 2

XI. FACILITY ADDRESS

12345 Schaeffer Highway
Detroit, MI

XII. TRANSPORTATION SERVICES USED

Nelson Industrial Services, MID098011992

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Chromic acid from circuit board etching	0 2 (33 34)	D 0 0 2 (35 38) D 0 0 7 (39 42)	9 0 1 (43 50)	P (51 60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

C	M	I	D	0	0	8	2	2	2	0	7	5	7	[	1	]
1	2												13	14	15	

X. FACILITY'S EPA I.D. NO.

[	F	M	I	D	9	2	0	6	1	1	5	2	9	8	]
16														28	

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro Chem Processing

XI. FACILITY ADDRESS

421 Lycaste
Detroit, MI 48214

XII. TRANSPORTATION SERVICES USED

Inland Waters Pollution Control, MID000820365

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Ignitable mixture of spent stoddard solvent, chlorinated degreasing solvents and paint thinners	0,8	D,0,0,1 F,0,0,5 F,0,0,3 D,0,0,8	8,4,7,7	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII, Line 1 - Stoddard solvent was used to purge carburetors of a flammable liquid residual and to degrease parts. Paint and paint thinners were used in maintenance painting and contain mineral spirits, lead from paint, and listed flammable solvents.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C | H | I | D | 0 | 8 | 2 | 2 | 2 | 0 | 7 | 5 | 7 | T/A C | 1 |

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Battery Disposal Technology

X. FACILITY'S EPA I.D. NO.

F | H | I | D | 0 | 0 | 0 | 6 | 3 | 2 | 3 | 7 | 2 |

XI. FACILITY ADDRESS

P.O. Box U
Clarence, NY 14031

XII. TRANSPORTATION SERVICES USED

Coastal Tank Services, OHD008940116

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Depleted lithium batteries used in instrumentation of vehicles	20	D003	56	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 8 2 2 0 7 5 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Ignitable mixture of paint residue from maintenance painting & chlorinated solvent residue	0,8	D 0 0 1 F 0 0 1 F 0 0 4 F 0 0 5	2 0 0 0	P
	2	Ignitable adhesives & sealants used in maintenance work	0,8	D 0 0 1 F 0 0 3 F 0 0 5	4 5 5	P
	3	Depleted lithium batteries used in instrumentation of vehicles	2,0	D 0 0 3	4 3 2	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear mail here

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII, Lines 1, 2 & 3 - 1983 Generated; generated before 10-1-83 and in storage awaiting off-site disposal.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M T D 0 8 2 2 2 0 7 5 7 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

F

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Spent ignitable mixture of paint & paint thinners from maintenance painting	0 8	D 0 0 1 F 0 0 3 F 0 0 5	1 7 4 3	P
	2	Depleted lithium batteries used in instrumentation of vehicles	2 0	D 0 0 3	1 6 2	P
	3	Ignitable adhesives used in maintenance work	0 8	D 0 0 1 F 0 0 3 F 0 0 5	1 3 1	P
	4	Ignitable paint residue from maintenance painting	0 8	D 0 0 1 F 0 0 3 F 0 0 5	1 0 0 0	P
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII, Lines 1, 2, 3 & 4 - 1983 Generated; stored on-site less than 90 days as of 12-31-83.

Georgia Environmental Protection Division
GEORGIA ANNUAL HAZARDOUS WASTE REPORT
Reporting Period January 1 thru December 31, 1983
FORM A
IDENTIFICATION

Please print/type with Elite type (12 characters per inch)

I. EPA I.D. NUMBER GAD059522870

II. NAME OF INSTALLATION
GNAD LAKEWOOD

III. INSTALLATION MAILING ADDRESS

PO BOX 16505
Street or P.O.Box
ATLANTA GEORGIA 30321
City or Town State Zip Code

IV. LOCATION OF INSTALLATION (if different than Section III. above)

510 SAWTELL AVE
Street or Route Number
ATLANTA GEORGIA 30315
City or Town State Zip Code
FULTON
County

V. INSTALLATION CONTACT

RAMSEY, ROBERT
Name (last and first)
404 624 2741
Phone No. (Area code & number)

VI. PROCESS IN USE (Check as appropriate)

SQG	GEN	TRN	TO1	TO2	TO3	TO4	SO1	SO2	SO3	SO4	DSO	DS1	DS3
	x						x			x			

x PRIVATE (Handle only self generated waste) __ COMMERCIAL (Handle waste generated from other sources)

VII. CERTIFICATION - I certify under penalty of Law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

John Tidd, Director, Plant Engineering — 2-21-84
Print/Type Name & Title — Signature of Authorized Representative — Date Signed

Name of Installation: GMAD - LAKEWOOD

EPA I.D. Number: GAD059522870

Form B

SELF-GENERATED HAZARDOUS WASTE AND ITS DISPOSITION

1. EPA HAZARDOUS WASTE NUMBER	D001	F006				TOTAL
2. On Hand, On-site on January 1, 1983	2,313	600,000				602,313
3. Generated during 1983	5,250					5,250
4. TOTAL AMOUNT FOR WHICH TO ACCOUNT	7,563	600,000				607,563
5. Shipped to State of						
6. Shipped to State of						
7. Shipped to State of						
8. Shipped to State of						
9. Shipped to Georgia Facility for Use, Reuse, Recycle or Reclaim	5,250					5,250
10. Shipped to Georgia Facility for Treatment, Storage, or Disposal						
11. Treated On-site						
12. Treatment Code						
13. Disposed of On-site						
14. Disposal Code						
15. On Hand, On-site on December 31, 1983	2,313	600,000				602,313
16. Storage Code	S01	S04				
17. Other (Explain)						
18. TOTAL AMOUNT OF DISPOSITION	7,563	600,000				607,563

ANNUAL HAZARDOUS WASTE REPORT

PART I

This form must be used for submission of Annual Reports by:

- Generators who meet the definition of Large Quantity Generator, or who generate any amount of PCB wastes in concentrations of 50 ppm or greater.
- Facilities which treat, store, use or dispose of hazardous waste at the site of generation.
- Owners/operators of wastewater treatment units (as defined in 310 CMR 30.605).

Please refer to the Part I Instructions before completing this form.

1. **Type of Report** (s): check where applicable

   (XX) Generator ( ) Treatment, Storage, Disposal Facility and/or Wastewater Treatment Unit

2. **Reporting Year**: Year ending 19 83

3. **EPA Identification Number**: MAD019369602

4. **Installation's Name**: GM Assembly Division G.M.C.

5. **Installation's Address**: 63 Western Avenue
   Framingham, MA

6. **Installation Contact**: John A. Hagen Tel. No.: 875-7421

ATTACH MAILING LABEL IF INCORRECT

7. Does your installation discharge process wastewater? X Yes ___ No
   If No, continue to question 8. If Yes, complete the appropriate line(s):

   (a) NPDES Permit Number MA0003808 (b) Municipal sewerage system MDC (Name)

   Do any of the wastewater discharges indicated in (a) or (b) involve hazardous waste activity? No
   ___ Yes Which? ___ (a) ___ (b)

8. Is your installation listed as an Air Quality Source Registration? X Yes ___ No

9. **Transportation Services Used**: (List name and EPA ID number of each.)

Chemical Waste Management, Inc.	MAD980523203
Clean Harbor, Inc.	MAD000846352
SCA Chemical Services, Inc.	MAD053452637

10. **Certification**:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

In addition, I understand that any material supplied with this application will not be considered confidential unless I have specifically requested that such material be kept confidential and the Department has made a determination of confidentiality in accordance with 310 CMR 3.00, Regulations Governing Access to and Confidentiality of Department Records and Files under the Hazardous Waste Management Act.

A. M. Beirne — *Authorized Signature of Owner/Operator or Designated Official*

February 29, 1984 — *Date Signed*

A. M. Beirne — *Print or Type Name*

Plant Manager — *Title of Person Signing*

Massachusetts Form 1/84

PART 2

GENERATOR ANNUAL REPORT

Reproduce additional pages as necessary. Enter the page number of each sheet, as well as the total number of pages, in the lower right corner.

11. Generator's EPA Identification Number: M A D 0 1 9 3 6 9 6 0 2

12. On-Site Treatment as an Integral Part of the Manufacturing Process: (This is an optional question.)

N/A

A Description of Waste	B Hazardous Waste Number	C Amount of Waste	D Unit of Measure	E Handling Method

13. Waste Shipped Off-Site: (Complete a separate Part 2 Form for each facility to which waste was shipped.)

a) Name of Facility: Norlate Corporation

b) EPA ID Number: N Y D 0 8 0 4 6 9 9 3 5

c) Address (Street or P.O. Box): 628 South Saratoga St.

(City, State and Zip Code): Cohoes, NY 12047

Line Number	A Description of Waste	B Hazardous Waste Number	C Amount of Waste	D Unit of Measure	E Handling Method
1	Waste Thinner Flam. Liq.	D001	60CC	G	T07

14. Comments (refer to line number):

PART 2

(Continued)

13. Waste Shipped Off-Site: (Complete a separate Part 2 form for each facility to which waste was shipped.)

a) Name of Facility: *Chemical Waste Management, Inc.*

b) EPA ID Number: M A D 9 8 0 5 2 3 2 0 3

c) Address (Street or P.O. Box): *5 Strathmore Road*

(City, State and Zip Code): *Natick, MA 01760*

Line Number	A Description of Waste	B Hazardous Waste Number	C Amount of Waste	D Unit of Measure	E Handling Method
1	*Waste Paint & Thinner - Flam. Liq.*	*D001*	*9,785*	*G*	*S01*
2	*Waste Sealer - Flam. Solid*	*D001*	*4,710*	*G*	*S01*
3	*Waste Thinner - Flam. Liq.*	*D001*	*8,865*	*G*	*S01*
4	*Waste Oil - Combustible Liq.*	*M001*	*1,140*	*G*	*S01*
5	*Waste Liq. Wax - Combustible Liq.*	*D001*	*515*	*G*	*S01*
6	*Waste Lead Compound & Containers*	*D008*	*330*	*G*	*S01*
7	*111 - Trichloroethane*	*F001*	*155*	*G*	*S01*
8	*Asbestos Containing Steam Pipe Insulation*	-	*1.73*	*Y*	*S01*

14. Comments: (refer to line number)

PART 2

(Continued)

13. Waste Shipped Off-Site: (Complete a separate Part 2 form for each facility to which waste was shipped.)

a) Name of Facility: SCA Chemical Service, Inc.

b) EPA ID Number: MADO53452637

c) Address (Street or P.O. Box): 385 Quincy Avenue

(City, State and Zip Code): Braintree, MA 02184

Line Number	A Description of Waste	B Hazardous Waste Number	C Amount of Waste	D Unit of Measure	E Handling Method
1	PCB Oil & Transformer Flush. Liq.	M002	100	G	S01
2	Drained & Flushed SM X-Ray Transformers	M002	484	P	S01
3	PCB Capacitors > 3 # Fluid Each	M002	1055	P	S01
4	PCB Contaminated Rags, Sorbent, Etc.	M002	345	P	S01

14. Comments: (refer to line number)

Georgia Environmental Protection Division
GEORGIA ANNUAL HAZARDOUS WASTE REPORT
Reporting Period January 1 thru December 31, 1983
FORM A
IDENTIFICATION

Please print/type with Elite type (12 characters per inch)

I. EPA I.D. NUMBER GAD075942706

II. NAME OF INSTALLATION
GMC DELCO READY ELIZGERALD

III. INSTALLATION MAILING ADDRESS

P.O.BOX 1071
Street or P.O.Box
ELIZGERALD GA 31750
City or Town State Zip Code

IV. LOCATION OF INSTALLATION (if different than Section III. above)

PERRY HOUSE ROAD
Street or Route Number
ELIZGERALD GA 31750
City or Town State Zip Code
BEN HILL
County

V. INSTALLATION CONTACT

SEKOWSKI, LEONARD
Name (last and first)
912-423-5461
Phone No. (Area code & number)

VI. PROCESS IN USE (Check as appropriate)

SQG	GEN	TRN	T01	T02	T03	T04	S01	S02	S03	S04	D80	D81	D83
	X												

X PRIVATE (Handle only self generated waste) __ COMMERCIAL (Handle waste generated from other sources)

VII. CERTIFICATION - I certify under penalty of Law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sekowski, Leonard	Leonard Sekowski	2-29-84
Print/Type Name & Title	Signature of Authorized Representative	Date Signed
Plant Engineer		

Name of Installation: EMC DELCO REMY FITZGERALD

EPA I.D. Number: GAD075942206

Form B

SELF-GENERATED HAZARDOUS WASTE AND ITS DISPOSITION

1. EPA HAZARDOUS WASTE NUMBER	D.0.0.8	K.0.6.9				TOTAL
2. On Hand, On-site on January 1, 1983	0	0				
3. Generated during 1983	320.710	2.600				323.310
4. TOTAL AMOUNT FOR WHICH TO ACCOUNT	320.710	2.600				323.310
5. Shipped to State of ALABAMA	320.710	2.600				323.310
6. Shipped to State of						
7. Shipped to State of						
8. Shipped to State of						
9. Shipped to Georgia Facility for Use, Reuse, Recycle or Reclaim						
10. Shipped to Georgia Facility for Treatment, Storage, or Disposal						
11. Treated On-site						
12. Treatment Code						
13. Disposed of On-site						
14. Disposal Code						
15. On Hand, On-site on December 31, 1983	0	0				0
16. Storage Code						
17. Other (Explain)						
18. TOTAL AMOUNT OF DISPOSITION	320.710	2.600				323.310

Georgia Environmental Protection Division
GEORGIA ANNUAL HAZARDOUS WASTE REPORT
Reporting Period January 1 thru December 31, 1983
FORM A
IDENTIFICATION

Please print/type with Elite type (12 characters per inch)

I. EPA I.D. NUMBER GAD003310810

II. NAME OF INSTALLATION
GMC GM Assembly Division Doraville Plant

III. INSTALLATION MAILING ADDRESS

3900 Motors Industrial Way
Street or P.O.Box
Doraville Georgia 30360
City or Town State Zip Code

IV. LOCATION OF INSTALLATION (if different than Section III. above)

Street or Route Number

City or Town State Zip Code
DeKalb
County

V. INSTALLATION CONTACT

Schilling Paul J.
Name (last and first)
404-455-5118
Phone No. (Area code & number)

VI. PROCESS IN USE (Check as appropriate)

SQG	GEN	TRN	TO1	TO2	TO3	TO4	SO1	SO2	SO3	SO4	D80	D81	D83
	X						X						

X PRIVATE (Handle only self generated waste) ___ COMMERCIAL (Handle waste generated from other sources)

VII. CERTIFICATION - I certify under penalty of Law that I have personally examined a
am familiar with the information submitted in this and all attached documents, and th
based on my inquiry of those individuals immediately responsible for obtaining t
information. I believe that the submitted information is true, accurate, and complet
I am aware that there are significant penalties for submitting false informatio
including the possibility of fine and imprisonment.

George A Lee - for
Paul J. Schilling, Director - Plant Engineering 1/30/1984
Print/Type Name & Title Signature of Authorized Representative Date Signed

Name of Installation: GMC GM Assembly Division Doraville Plant

EPA I.D. Number: GA D003310810

Form D

SELF-GENERATED HAZARDOUS WASTE AND ITS DISPOSITION

	F 0 1 0 1 3 F 0 1 0 1 5	F 0 1 0 1 6 D 0 0 1 1	D 0 1 0 1 8	D 0 1 0 1 1	D 0 1 0 1 2	TOTAL
1. EPA HAZARDOUS WASTE NUMBER						
2. On Hand, On-site on January 1, 1983	13.200	7.000	2.000	8.000	16.500	46.700
3. Generated during 1983	356.575	526.690	54.630	44.285	191.990	1,174.170
4. TOTAL AMOUNT FOR WHICH TO ACCOUNT	369.775	533.690	56.630	52.285	208.490	1,220.870
5. Shipped to State of Alabama		531.190	55.830	37.460	197.990	822.470
6. Shipped to State of Tennessee	5.950			11.900		17.850
7. Shipped to State of Michigan	72.000					72.000
8. Shipped to State of						.
9. Shipped to Georgia Facility for Use, Reuse, Recycle or Reclaim	269.100					269.100
10. Shipped to Georgia Facility for Treatment, Storage, or Disposal						
11. Treated On-site						
12. Treatment Code						
13. Disposed of On-site						
14. Disposal Code						
15. On Hand, On-site on December 31, 1983	22.725	2.500	.800	2.925	10.500	39.450
16. Storage Code	S01	S01	S01	S01	S01	
17. Other (Explain)						
18. TOTAL AMOUNT OF DISPOSITION	369.775	533.690	56.630	52.285	208.490	1,220.870

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983

I. GENERATOR'S EPA I.D. NUMBER

MSD083451039

II. NAME OF INSTALLATION

GMC Delco Remy - Laurel Plant

III. INSTALLATION MAILING ADDRESS

P. O. Box 1981
Street or P. O. Box

Laurel — MS — 39441
City or Town — State — Zip Code

IV. LOCATION OF FACILITY (if different than section III above)

1 Thames Avenue
Street or Route number

Laurel — MS — 39440
City or Town — State — Zip Code

V. INSTALLATION CONTACT

Cantrell, Kenneth K.
Name (last and first)

601-649-7414
Phone No. (area code & no.)

VI. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Paul George, Plant Superintendent — Paul L George — 2/20/84
Print/Type Name — Title — Signature of Authorized Representative — Date

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (CONT.)

This report is for the calendar year ending 1983

VII. GENERATOR'S EPA I.D. NO.

MSD 083451039

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)
Chemical Waste Management Inc.

IX. FACILITY'S EPA I.D. NO.

ALD000622464

X. FACILITY ADDRESS

Emelle, Alabama 35459

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during the reporting period. This section to be completed only once. Do not repeat on supplemental sheets.)

Chemical Waste Management Inc. ID ALD000622464

XII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Paint Residue/ Flamable Liquid	08	D001 D007	10	T
2	Oil Separator Sludge Flamable Liquid	08	D001	11	T
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number - see instructions)

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DIVISION OF WASTE MANAGEMENT

HAZARDOUS WASTE REPORT

FOR THE PERIOD BEGINNING 1-1-83 AND ENDING 12-31-83

GENERAL INFORMATION

EPA ID NUMBER KYD000622993

INSTALLATION NAME: GMC, GM ASSEMBLY DIVISION, BOWLING GREEN PLANT

INSTALLATION MAILING ADDRESS: P.O. BOX Q, BOWLING GREEN, KY 42102-4925

INSTALLATION LOCATION: I-65 AT HWY. 31-W, BOWLING GREEN, KY 42101

COUNTY: WARREN

CONTACT PERSON: J.R. SPENCER TELEPHONE: (502) 781-7800

TYPE OF ACTIVITY: ☐ GENERATION ☐ RECYCLING ☒ TREATMENT ☐ STORAGE ☐ DISPOSAL ☐ UNDERGROUND INJECTION

TYPE OF REPORT: ☒ ANNUAL ☐ QUARTERLY ☐ UNMANIFESTED WASTE

NUMBER OF: SUMMARY SHEETS ATTACHED 1 WASTES REPORTED 4

TRANSPORTATION SERVICES USED

EPA ID NUMBER	COMPANY NAME
SEE ATTACHED SHEETS	

COMMENTS

SEE ATTACHED SHEETS

FOR TREATMENT, STORAGE AND DISPOSAL FACILITIES ONLY

COST ESTIMATE FOR: CLOSURE $ 37,000 POST CLOSURE $ N/A

CERTIFICATION: *I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.*

N.F. WHITEHEAD — PRINT OR TYPE NAME

N.F. Whitehead — SIGNATURE

2-23-84 — DATE SIGNED

DEP8017 1/84

KENTUCKY DIVISION OF WASTE MANAGEMENT

HAZARDOUS WASTE INFORMATION SUMMARY

GENERAL INFORMATION

INSTALLATION NAME: GMC, GM ASSEMBLY DIVISION, BOWLING GREEN PLANT EPA ID NUMBER: KYD000622993

TYPE OF ACTIVITY: ☐ GENERATOR ☐ RECYCLING ☒ TREATMENT ☐ STORAGE ☐ DISPOSAL

TYPE OF FILING: ☒ ANNUAL REPORT ☐ QUARTERLY REPORT ☐ REGISTRATION ☐ UNMANIFESTED WASTE REPORT

FILING PERIOD: BEGINNING 1-1-83 AND ENDING 12-31-83

WASTE SUMMARY

LINE NUMBER	DESCRIPTION OF WASTE	EPA WASTE NUMBER	DOT HAZARD CLASS	PHYSICAL STATE	AMOUNT OF WASTE	UNIT OF MEASURE	DISPOSITION CODE	TRANSFER CODE	HANDLING METHOD
1	FLAMMABLE SOLID, N.O.S.	D001	F.S.	S	105	T	OHXT	KYD000622993	T47

DWM 7-211

NOTES FOR HAZARDOUS WASTE FACILITY REPORT

1. T47 for Flammable Solids consists of on-site solidification and filling of void spaces in containers prior to shipment off site for landfilling.

LIST OF TRANSPORTERS

EPA I.D. NUMBER	NAME OF COMPANY
KYD0818438817	L.W.D., Inc.
KYD053348108	McKesson Envirosystems Company
TND081455891	Tennessee Oil & Refining, Inc.
OHD087433744	CECOS/CER Company

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DIVISION OF WASTE MANAGEMENT

HAZARDOUS WASTE REPORT

FOR THE PERIOD BEGINNING 1-1-83 AND ENDING 12-31-83

GENERAL INFORMATION

EPA ID NUMBER KYD000622993

INSTALLATION NAME: GMC, GM ASSEMBLY DIVISION, BOWLING GREEN PLANT

INSTALLATION MAILING ADDRESS: P.O. BOX Q, BOWLING GREEN, KY 42102-4925

INSTALLATION LOCATION: I-65 AT HWY. 31-W, BOWLING GREEN, KY 42101

COUNTY: WARREN

CONTACT PERSON: J.R. SPENCER TELEPHONE: (502) 781-7800

TYPE OF ACTIVITY: ☐ GENERATION ☐ RECYCLING ☐ TREATMENT ☒ STORAGE ☐ DISPOSAL ☐ UNDERGROUND INJECTION

TYPE OF REPORT: ☐ ANNUAL ☐ QUARTERLY ☐ UNMANIFESTED WASTE

NUMBER OF: SUMMARY SHEETS ATTACHED 1 WASTES REPORTED 4

TRANSPORTATION SERVICES USED

EPA ID NUMBER	COMPANY NAME
SEE ATTACHED SHEETS	

COMMENTS

SEE ATTACHED SHEETS

FOR TREATMENT, STORAGE AND DISPOSAL FACILITIES ONLY

COST ESTIMATE FOR: CLOSURE $ 37,000 POST CLOSURE $ N/A

CERTIFICATION: *I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.*

N.F. WHITEHEAD (PRINT OR TYPE NAME) — N.F. Whitehead (SIGNATURE) — 2-23-84 (DATE SIGNED)

DEP5017 1/84

KENTUCKY DIVISION OF WASTE MANAGEMENT

HAZARDOUS WASTE INFORMATION SUMMARY

GENERAL INFORMATION

INSTALLATION NAME: GMC, GM ASSEMBLY DIVISION, BOWLING GREEN PLANT EPA ID NUMBER: KYD000622993

TYPE OF ACTIVITY: ☐ GENERATOR ☐ RECYCLING ☐ TREATMENT ☒ STORAGE ☐ DISPOSAL

TYPE OF FILING: ☒ ANNUAL REPORT ☐ QUARTERLY REPORT ☐ REGISTRATION ☐ UNMANIFESTED WASTE REPORT

FILING PERIOD: BEGINNING 1-1-83 AND ENDING 12-31-83

WASTE SUMMARY

LINE NUMBER	DESCRIPTION OF WASTE	EPA WASTE NUMBER	DOT HAZARD CLASS	PHYSICAL STATE	AMOUNT OF WASTE	UNIT OF MEASURE	DISPOSITION CODE	TRANSFER CODE	HANDLING METHOD
1	FLAMMABLE SOLID, N.O.S.	D001	F.S.	S	105	T	OHXT	KDY000622993	S01
2	FLAMMABLE LIQUID, N.O.S.	F003 F005 D001	F.L.	L	19,000	G	KYXT	KYD000622993	S01
3	FLAMMABLE LIQUID, N.O.S. (SAME WASTE AS LINE 2)	F003 F005 D001	F.L.	L	24,000	G	TNXT	KYD000622993	S01
4	COMBUSTIBLE LIQUID, N.O.S.	F003 F005 D001	F.L.	L	9,000	G	KYXT	KYD000622993	S01

DWM 9 2 81

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DIVISION OF WASTE MANAGEMENT

HAZARDOUS WASTE REPORT

FOR THE PERIOD BEGINNING 1-1-83 AND ENDING 12-31-83

GENERAL INFORMATION EPA ID NUMBER KYD000622993

INSTALLATION NAME: GMC, GM ASSEMBLY DIVISION, BOWLING GREEN PLANT
INSTALLATION MAILING ADDRESS: P.O. BOX Q, BOWLING GREEN, KY 42102-4925
INSTALLATION LOCATION: I-65 AT HWY. 31-W, BOWLING GREEN, KY 42101
COUNTY: WARREN
CONTACT PERSON: J.R. SPENCER TELEPHONE: (502) 781-7800
TYPE OF ACTIVITY: ☒ GENERATION ☐ RECYCLING ☐ TREATMENT ☐ STORAGE ☐ DISPOSAL
☐ UNDERGROUND INJECTION
TYPE OF REPORT: ☒ ANNUAL ☐ QUARTERLY ☐ UNMANIFESTED WASTE
NUMBER OF: SUMMARY SHEETS ATTACHED 1 WASTES REPORTED 4

TRANSPORTATION SERVICES USED

EPA ID NUMBER	COMPANY NAME
SEE ATTACHED SHEETS	

COMMENTS

SEE ATTACHED SHEETS

FOR TREATMENT, STORAGE AND DISPOSAL FACILITIES ONLY

COST ESTIMATE FOR: CLOSURE $ 37,000 POST CLOSURE $ N/A

CERTIFICATION: *I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.*

N.F. WHITEHEAD — PRINT OR TYPE NAME
N.F. Whitehead — SIGNATURE
2-23-84 — DATE SIGNED

DEP5017 1/84

KENTUCKY DIVISION OF WASTE MANAGEMENT

HAZARDOUS WASTE INFORMATION SUMMARY

GENERAL INFORMATION

INSTALLATION NAME: GMC, GM ASSEMBLY DIVISION, BOWLING GREEN PLANT EPA ID NUMBER: KYD000622993

TYPE OF ACTIVITY: ☒ GENERATOR ☐ RECYCLING ☐ TREATMENT ☐ STORAGE ☐ DISPOSAL

TYPE OF FILING: ☒ ANNUAL REPORT ☐ QUARTERLY REPORT ☐ REGISTRATION ☐ UNMANIFESTED WASTE REPORT

FILING PERIOD: BEGINNING 1-1-83 AND ENDING 12-31-83

WASTE SUMMARY

LINE NUMBER	DESCRIPTION OF WASTE	EPA WASTE NUMBER	DOT HAZARD CLASS	PHYSICAL STATE	AMOUNT OF WASTE	UNIT OF MEASURE	DISPOSITION CODE	TRANSFER CODE	HANDLING METHOD
1	FLAMMABLE SOLID, N.O.S.	D001	F.S.	S	105	T	OHXT	OH0087433744	T47 D81
2	FLAMMABLE LIQUID, N.O.S.	F003 F005 D001	F.L.	L	19,000	C	KYXT	KYD088438817	T07
3	FLAMMABLE LIQUID, N.O.S. (SAME WASTE AS LINE 2)	F003 F005 D001	F.L.	L	24,000	C	TNXT	TND000737510	T66
4	COMBUSTIBLE LIQUID, N.O.S.	F003 F005 D001	F.L.	L	9,000	C	KYXT	KYD088438817	T54

NOTES FOR GENERATOR'S ANNUAL REPORT

1. T47 for Flammable Solids N.O.S. consists of on-site solidification by use of absorbent material and filling of void spaces in containers prior to shipment off site for landfilling.

2. T66 for Flammable Liquids N.O.S. consists of off-site processing by Chem-Fuel, Inc., Portland, Tennessee, into boiler fuels.

3. T54 distillation is performed by McKesson Envirosystems, Inc., for recycle of solvents which are returned to GMAD Bowling Green for reuse.

LIST OF TRANSPORTERS

EPA I.D. NUMBER	NAME OF COMPANY
KYD0818438817	L.W.D., Inc.
KYD053348108	McKesson Envirosystems Company
TND081455891	Tennessee Oil & Refining, Inc.
OHD087433744	CECOS/CER Company

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

IND000806877 161
Delco Remy Division, GMC
4500 South Delaware Drive
Muncie IN 47302

FORM E: Installation Identification Form

ENVIRONMENTAL MANAGEMENT BOARD

INSTRUCTIONS: Please refer to the specific instructions before completing this form. The information requested herein is required by IC 13-7-8.5-2.

I. TYPE OF HAZARDOUS WASTE REPORT FOR THE YEAR ENDING DEC. 31, 19 83

FORM G: GENERATOR ANNUAL REPORT	[X]	FORM F: FACILITY ANNUAL REPORT	[X]
DID NOT GENERATE/TSD HAZARDOUS WASTE	[ ]	SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE	[ ]

II. INSTALLATION'S EPA I.D. NUMBER

III. NAME OF INSTALLATION

IV. INSTALLATION MAILING ADDRESS

Street or P. O. Box

City or Town

State | Zip Code

V. LOCATION OF INSTALLATION

Street or P. O. Box

City or Town

State | Zip Code | County DELAWARE

VI. INSTALLATION CONTACT

Last Name	First Name	Phone (area code & no.)
WESTON	WAYNE	317/747-2193

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(A.) PRINT OR TYPE NAME	(B.) SIGNATURE	(C.) DATE SIGNED
L. Wayne Weston	L Wayne Weston	2-23-84

Please print or type with ELITE type (12 characters per inch).

SDH66-001 State Form 18288-A
Revised 10/82

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I|N|D|0|0|0|8|0|6|8|7|7|

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

IND081535445 IND048522460 IND075960286

X. FACILITY'S NAME (specify) | N|A|T|I|O|N|A|L| |S|M|E|L|T|I|N|G| |A|N|D| |R|E|F|I|N|I|N|G| FACILITY'S EPA ID NUMBER | N|J|D|0|6|1|8|4|3|2|4|0|

XI. FACILITY'S ADDRESS

Street or P. O. Box | P|E|N|S|G|R|O|V|E| |P|E|D|R|I|C|K|T|O|W|N| |R|O|A|D| | | | | | |

City or Town | P|E|D|R|I|C|K|T|O|W|N| | | | | | | | | | | State | N|J| Zip | 0|8|0|6|7|

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (In Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Emission Control Dust/Sludge From	1 5	K 0 6 9	1 1 9 9 1 9 4	(P) T
2	Secondary Lead Smelting	1			P T
3		1			P T
4		1			P T
5		1			P T
6		1			P T
7		1			P T
8		1			P T

XIII. COMMENTS (enter information by line number -- see instructions)

State Form 19286R
SB116d-4812

Revised 10/82

MAY BE PHOTOCOPIED

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 1983

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 0 | 8 | 0 | 6 | 8 | 7 | 7 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) | I | L | W | D | | | N | C | | |

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM F: FACILITY ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

XIV. FACILITY'S EPA ID NUMBER | I | N | D | 0 | 0 | 0 | 8 | 0 | 6 | 8 | 7 | 7 |

XV. COST ESTIMATES FOR FACILITIES This information is required only on one copy of Form F.

A. COST ESTIMATE FOR FACILITY CLOSURE $ | | | | , | 8 | 1 | 2 | , | 0 | 2 | 3 | .00

B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE $ | | | | , | | | | , | | | | .00

XVI. GENERATOR'S NAME (specify) | O | N | | S | I | T | E | GENERATOR'S EPA ID NUMBER

XVII. GENERATOR'S ADDRESS

Street or P. O. Box

City or Town | State | | Zip |

XVIII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) HAZARDOUS WASTE NUMBER (see codes)	(C.) HANDLING METHOD (code)*	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Emission Control Dust/Sludge -	K069	S01	89194	(P) T
2	From Secondary Lead Smelting				P T
3					P T
4	Waste Water Treatment Sludge - From	D008	S01	1692744	(P) T
5	Manufacture of Lead Acid Storage				P T
6	Batteries				P T
7					P T
8					P T

XIX. COMMENTS (enter information by line number -- see instructions)

* See Section XVIII-C of instructions for wastes handled by more than one method.

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

O H D 0 0 0 0 8 1 7 0 2 3 1 1

1 2 13 14 15

II. NAME OF INSTALLATION

G M C I N L A N D I D I V I S I O N D A Y T O N P L A N T

30 67

III. INSTALLATION MAILING ADDRESS

P O B O X 1 2 2 4

15 16 45

Street or P.O. Box

D A Y T O N O H 4 5 4 0 1

15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

2 2 0 1 H O M E A V E N U E 5 7

45 46 County Code

D A Y T O N O H 4 5 4 1 7 3 7 1 1 4

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

[redacted] 5 1 3 - 2 6 7 - 1 3 0 8 0

Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES

Indiana Liquid Transporters IND058484114 Chem Met Services MID096963194
Chemical Waste Management OHD000724161 PPW Division Ohio
[illegible] Recycling Services OHD093945213 Rob'l Powerwash OHD075057747

VII. CERTIFICATION

[illegible] and that based

Harold C. Barhold 3/19/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA 8019 Page 1 of 8

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

TAC

C O H D 0 0 0 8 1 7 0 2 3 2

IX. FACILITY'S EPA I.D. NO.

M I 0 0 9 6 9 8 3 1 9 4

X. FACILITY NAME

CHEM METL INDUSTRIES INC

XI. FACILITY'S ADDRESS

1 8 5 5 0 ALLEN ROAD

Street or P.O. Box

WYANDOTTE MI 4 8 1 9 2

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Phosphate-Metal Treatment	0 2	D 0 0 2	1 1 1 5 5	P
2	Rubber Adhesives & Solvents-used to join various rubber products	0 1	D 0 0 1 F 0 0 2 F 0 0 5	2 3 5 0	P
3		1 5			
4	Resins-Friction Materials Lab., Brake Lining Bonding Agent	0 1	D 0 0 1 D 0 0 8 F 0 0 3 F 0 0 5	7 2 0 0	P
5	Cements & Solvents coating for steel inserts to aid adhesion	0 1	D 0 0 1 D 0 1 8 F 0 0 2 F 0 0 5	2 2 0 1 5 0	P
6		1 5			
7	Paint & Solvents	0 1	D 0 0 1 D 0 0 8 D 0 0 7	4 5 0	P
8		1 5			
9					
10					
11					
12					

XIII. COMMENTS (Enter information by Item Number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facilities to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T AC

OHD 010 810 710 213 12

IX. FACILITY'S EPA I.D. NO.

OHD 093 945 293

X. FACILITY NAME

SOLVENT RECOVERY SERVICE OF OHIO

XI. FACILITY'S ADDRESS

P.O. BOX 453

Street or P.O. Box

WESTERVILLE OH 43059

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Polyol- used in the manufacturing of urethane foam products	01	D001	5400	P
2	Paint & Mixed Solvents- various manufacturing processes	01	F001 F005	6960	P
3		15			
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Solvents reclaimed for future use.

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

GOH0000818702312

IX. FACILITY'S EPA I.D. NO.

OHD000725025

X. FACILITY NAME

METROPOLITAN SEWER DISTRICT

XI. FACILITY'S ADDRESS

1600 GEST STREET

Street or P.O. Box

CINCINNATI OH 45204

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Polyol- used in the manufacturing of urethane foam products	01	D001	5400	P
2	Paint & Mixed Solvents- various manufacturing processes	01	F001 F0012 F0016	1403 5	P
3		15			
4	Oil & Water Mix.- hydraulic media for injection mold presses	01	D001	13150	P
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T-AC

OHD005148477 02 3 12

IX. FACILITY'S EPA I.D. NO.

OHD005148477

X. FACILITY NAME

SYSTECH CORP

XI. FACILITY'S ADDRESS

P.O. BOX 2666

Street or P.O. Box

PAULDING OH

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Paint & Mixed Solvents- various manufacturing processes	01	F001 F002 F005 D001 D006	8176 10	P
2		15			
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

OHIO1010818102 (TAC)

IX. FACILITY'S EPA I.D. NO.

OHIO9320900

X. FACILITY NAME

INDIANA LIQUID WASTE DISPOSAL

XI. FACILITY'S ADDRESS

ONE ENVIRONMENTAL PLAZA P O BOX WEST MORRIS ST

Street or P.O. Box

INDIANAPOLIS IN 46231

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Chromic Acid Solution-used to clean Rubber molds	02	D002	18200	P
2		15			
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C|O|H|0|0|0|0|8|1|7|0|2|3|2|

IX. FACILITY'S EPA I.D. NO.

O|H|D|0|8|2|8|0|6|1|1|

X. FACILITY NAME

T|R|I|C|I|L|L| |C|O|R|P|

XI. FACILITY'S ADDRESS

4|3|5|0|L|O|C|K|W|O|O|D| |A|V|E|N|U|E|

Street or P.O. Box

H|I|L|L|I|A|R|D| | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 11 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

TAC

OHD000817023 12

IX. FACILITY'S EPA I.D. NO.

X. FACILITY NAME

CALIFORNIA CONSULTING ENGINEERS

XI. FACILITY'S ADDRESS

15111 PIPELINE AVENUE

Street or P.O. Box

CHINO CA 91710

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Polyol- used in the manufacturing of urethane foam products	01	D001	31050	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Not a waste disposal site, CCE is buying off-spec material for use in the manufacturing of non-critical urethane foam products such as rug pads.

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

O H D 0 0 5 2 1 6 1 7 0 1 1

II. NAME OF INSTALLATION

G M C I N I L A N D D I V I S I O N - V A N D A L I A P L A N T

III. INSTALLATION MAILING ADDRESS

P O B O X 1 2 2 4

Street or P.O. Box

V A N D A L I A O H 4 5 3 7 7

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

4 0 0 N O R T H D I X I E D R I V E 5 7

County Code

V A N D A L I A O H 4 5 3 7 7 3 7 1 4

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

J O H N M O R A R I T Y 5 1 3 - 2 6 7 - 8 0 8 0

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED

List the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year.

Indiana Liquid Transporters	IND058484114	Chem Met Services	MID096963194
Chemical Waste Management	OHD00072x161	MPW Division Ohio	
Solvent Resource Recovery	OHD093945293	Mobil Powerwash	OHD075057747

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Edward C. Bockhold Gen. Mfg. Mgr. Edward C. Bockhold 3/19/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA 9019

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

OHD 052115170 12

IX. FACILITY'S EPA I.D. NO.

MID 091691331 4

X. FACILITY NAME

CHEMI METI SERVICES

XI. FACILITY'S ADDRESS

1855 ALLEN ROAD

street or P.O. Box

WAYNE TITLE MI 48192

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Resins-friction materials bonding agent brake lining	01	D001 D008 F001 F005	11935	P
2	Wax-mold release for urethane foam products	07	D001	1800	P
3	Polyol-used in the manufacturing of urethane foam products	01	D001	6300	P
4	Paint Sludge-residue from painting vinyl parts	01	D018 D001 D008 D001	7200	P
5		15			
6	Paint & Mixed Solvents-various painting systems	01	F001 F002 F001 F006	2700	P
7		15	D001 D008		
8	Grease-Ball Joint Assembly	01	D001	1150	P
9	Trivalent Chromic Acid-out of spec material from warehouse	02	D001	2700	P
10		155			
11	Barium Chloride Salts-out of spec Material from warehouse	02	D002	2250	P
12					

XIII. COMMENTS

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

Report by facility to which all wastes on this page were sent.

VIII. GENERATOR'S EPA I.D. NO.

C O H D 0 0 5 2 1 5 1 7 0 1 2

IX. FACILITY'S EPA I.D. NO.

I N D 0 9 3 2 1 9 0 1 2

X. FACILITY NAME

I N D I A N A L I Q U I D W A S T E D I S P O S A L I N C.

XI. FACILITY'S ADDRESS

9 0 1 E I E N V I R O N M E N T A L P L A Z A 1 7 9 0 1 W E S T M O R R I S S T.

Street or P.O. Box

I N D I A N A P O L I S I N 4 6 2 3 1

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Fluid Jet Cutter Water & Chromic Acid Solution-Brake lining cutting & conversion coating of brake hose couplings	0 2	D 0 0 1 2	3 8 7 8 9 8 0	P
2		1 5			
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (Enter information by section number)

Aproximately 15 to 20% Of the mixture is chromic acid solution they are shipped in bulk from collection tanks and combined for economics of transportation costs.

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31 19 83

FACILITY INFORMATION

(specify facilities to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T AC

C O H D 0 0 5 2 1 5 1 7 0 1 2

IX. FACILITY'S EPA I.D. NO.

O H D 0 8 1 2 9 0 6 1 1

X. FACILITY NAME

T R I C I L L C O R P.

XI. FACILITY'S ADDRESS

4 3 5 0 E D G E W Y N A V E N U E

Street or P.O. Box

H I L L I A R D O H 4 3 0 2 6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Chromic Acid Solution-Brake Hose Coupling conversion coating & fluid jet	0 2	D 0 0 1 2	4 8 6 0 0 0	P
2	cutter water	1 5			
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (Enter information by section numbers)

NOTE! See sheet #3.

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T AC

C O H D 0 0 1 5 2 1 1 5 1 1 7 0 1 1 2

IX. FACILITY'S EPA I.D. NO.

O H D 0 8 7 4 3 3 7 4 4

X. FACILITY NAME

C E C O S C E R C O L

XI. FACILITY'S ADDRESS

5 0 9 2 A B E R R O A D

Street or P.O. Box

W I L L I A M S B U R G O H 4 5 1 7 6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Brake Lining Resins-Bonding agent for friction materials	0 1	D 0 0 1 8 F 0 0 1 3	3 4	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Account Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify the city to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

C O H D 0 5 2 1 5 1 7 0 1 2

IX. FACILITY'S EPA I.D. NO.

X. FACILITY NAME

CLAUBORN INITIAL CONSULTING ENGINEERS

XI. FACILITY'S ADDRESS

1 5 1 1 PIPELINE AVENUE

Street or P.O. Box

CHINO CA 9 1 7 1 0

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (enter code)
1	Polyol- used in the manufacturing of urethane foam products	0 1	0 0 0 1	1 3 7 7 0 0	P
2	Isocyanates(TDI & MDI)- used in the manufacturing of urethane foam	0 1	0 2 1 3	1 2 6 0 0	P
3		1 5			
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (Identify information by section number)

1.& 2. Not a waste disposal site CCE is buying off spec materials for use in the manufacturing of non critical urethane foam products such as rug pads.

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T X C

M I T 2 7 0 0 1 0 0 4 4

1 2 13 14 15

III. NAME OF INSTALLATION

(10) G. M. C., Buick Motor Division (69)

IV. INSTALLATION MAILING ADDRESS

(15 16) 3002 E. Hamilton Ave., Bldg. 85 (45)

Street or P.O. Box

(15 16) Flint (41 42) MI (47 51) 48550

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(15 16) (45)

Street or Route number

(15 16) (41 42) (47 51)

City or Town State Zip Code

VI. INSTALLATION CONTACT

(15 16) Metcalfe, Robert S. (45)

Name (last and first)

(46) 313-766-3316 (55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

L.A. Streng — Manager-Manufacturing Engineering — Feb. 28, 1984

Print/Type Name — Signature of Authorized Representative — Date Signed

EPA Form 8700-13A(6-80) (Re-

Page 1 of 7

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.
[redacted] M I T 2 7 0 0 1 0 0 4 4 [redacted] T/A C
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
A1 Disposal Corporation

X. FACILITY'S EPA I.D. NO.
[redacted] M I D 0 5 9 6 9 5 4 5 2
16 28

XI. FACILITY ADDRESS
400 Broad St.
P. O. Box 248
Plainwell, MI 49080

XII. TRANSPORTATION SERVICES USED
Drug & Laboratory Disposal, Inc.
MID 0 9 2 9 4 7 9 2 8

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Mercury, Metallic-Liquid	- -	D 0 0 9	5 4 4	P
2	Waste Mercury, Metallic-empty containers	- -	D 0 0 9	8 8	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)
Waste mercury had been accumulated and the decision was made to dispose it rather than reclaim it. It was, however, sold for reclamation, not to be returned. Line 2 is the containers that had been used for accumulation.

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C

[redacted] M I T 2 7 0 0 1 0 0 4 [redacted]

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

G.M.C., Buick Motor Division

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 0 5 3 5 6 7 1 2

16 28

XI. FACILITY ADDRESS

902 E. Hamilton Ave.
Division 14
Flint, MI 48550

XII. TRANSPORTATION SERVICES USED

G.M.C., Buick Motor Division
MIT270010044

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Hazardous Waste, Liquid, N.O.S.	1	F 0 0 9	2 6 3 7 6	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Waste is oily sludge generated at Buick's Industrial Waste Treatment Plant located on the main site (MIT270010044). It is hauled in Buick-owned and operated tank trucks to the Buick Steam Generating Plant, Div. 14 (MID005356712) where it provides less than 3% of the fuel value for the coal-fired boilers.

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I T 2 7 0 0 1 0 0 4 4 [redacted] T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met Services

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

18550 Allen Rd.
Wyandotte, MI 48192

XII. TRANSPORTATION SERVICES USED

A1 Disposal, MID059695452

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Flammable Solid, NOS	0 9	D 0 0 1	4 8 5 3 8	P
2	Waste Flammable Liquid, NOS	0 8	D 0 0 1	2 7 3 7 8	P
3	Hazardous Waste Solid, NOS	1 5	D 0 0 7	3 2 5 6 0	P
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Page 4 of 7

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I T A 7 0 0 1 0 0 4 [redacted]
1 2 13 14 15 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 5 7 0 0 2 6 0 2
16 28

XI. FACILITY ADDRESS

27140 Princeton
P. O. Box 431
Inkster, MI 48141

XII. TRANSPORTATION SERVICES USED

Environmental Waste Control - MID057002602

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Cyanide Mixture	1, B (33 34)	P 0 7 4 0 (35 38 39 42)	1 2 2 0 (43 46 47 50 51 59)	P (60)
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Page 5 of [redacted]

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I T 2 7 0 1 0 1 0 0 4 4 T/A C [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro-Chem Processing, Inc.

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 Lycaste
Detroit, MI 48214

XII. TRANSPORTATION SERVICES USED

Drury Brothers, Inc. - MID056988892

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Flammable Liquid, NOS	0 8	D 0 0 1	5 6 3 7 6 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I T 2 7 0 0 1 1 0 0 4 4 [redacted]
1 2 13 14 15 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 4 8 0 9 0 6 3 3
16 28

XI. FACILITY ADDRESS

P. O. Box 5187
Dearborn, MI 48128

XII. TRANSPORTATION SERVICES USED

Freeport Aggregate, Inc. - MID049263783

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Hazardous Waste Solid, NOS	1 5 (31 34)	F 0 0 6 (35 38 39 42 / 43 46 47 50)	3 6 7 7 (51 59)	T (60)
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number --see instructions)

...MENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

(1) Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☒ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C
M I D 0 0 5 3 5 6 7 1 2 t
1 2 13 14 15

III. NAME OF INSTALLATION

G.M.C., Buick Motor Division
30 69

IV. INSTALLATION MAILING ADDRESS

3 9 0 2 E. Hamilton Ave., Bldg. 815
15 16 45
Street or P.O. Box

4 F l i n t M I 4 8 5 5 0
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5 9 0 2 E. Hamilton Ave., Div. 14
15 16 45
Street or Route number

6 F l i n t M I 4 8 5 5 0
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

7 M e t c a l f, R o b e r t S.
15 16 45
Name (last and first)

3 1 3 - 7 6 6 - 3 3 1 6
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally [illegible] and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

L.A. Streng — Manager-Engineering Manufacturing — Feb. 28, 1984

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

Page 1 of 1

Tear out here

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31 of: 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

F	O	H	D	0	0	0	8	1	7	5	8	5	1
1	2									13	14	15	

II. NAME OF INSTALLATION

GMC DELCO PRODUCTS DIVISION - KETTERING PLANT

30 67

III. INSTALLATION MAILING ADDRESS

P O BOX 1042

15 16 45

Street or P.O. Box

DAYTON OH 45401

17 18 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

1609 KUNTZ ROAD 57

15 16 45 47 48

County Code

DAYTON OH 45404 3714

17 18 41 42 47 51 53 56

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

JARELNIAK, MICHAEL BLAINE 513-258-7621

15 16 45 46 55

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification number of all hazardous waste transporters whose services you used during the reporting year.

OHD004255410

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

C. W. Ondrick Plant Manager Dayton Operations C W O 2/29/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA 9019

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(Identify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

TAC

OHD 000 817 585 12

IX. FACILITY'S EPA I.D. NO.

OHD 041 255 141 01

X. FACILITY NAME

GMIC IDIEILICIOL IPIRIODUCTIS IDIIVIKEITIEIRITINIG

XI. FACILITY'S ADDRESS

P.O. BOX 1104 12

Street or P.O. Box

DAYTON OH 45401

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste perchloroethylene	1 2	F 0 0 1	5 0	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by waste number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

FACILITY ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. FACILITY'S EPA I.D. NUMBER

EMC

F U H D 0 0 0 8 1 7 5 8 5 T T

1 3 13 14 15

II. NAME OF FACILITY

GMC DELCO PRODUCTS DIV DAYTON PLT S

20 67

III. FACILITY MAILING ADDRESS

P O BOX 7042

15 16 45

Street or P.O. Box

DAYTON OH 45401

15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF FACILITY

3161 KUNTZ RD

15 16 45

57

47 48

County Code

DAYTON OH 45414 3714

15 16 41 42 47 51 53 56

City or Town State Zip Code Primary SIC Code

V. FACILITY CONTACT

KARR NANCY BERR

15 16 43

Name (last and first)

513-258-7621

46 55

Phone No. (area code & no.)

VI. COST ESTIMATES FOR FACILITY

A. Cost Estimate for Facility Closure

$ 3500

16 18 19 21 22 24

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

$

25 27 28 30 31

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

C. W. Ondrick Plant Manager Dayton Operations C W Ondrick 2/29/84

Print/Type Name Title Signature of Authorized Representative Date Signed

W 7020

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

FACILITY ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

GENERATOR INFORMATION

(specify generator from which all wastes on this page were received)

VIII. FACILITY'S EPA I.D. NO.

TAMC

C O H D 0 0 0 8 1 7 5 8 5 (2)

IX. GENERATOR'S EPA I.D. NUMBER

X. GENERATOR NAME

O N S I T E

XI. GENERATOR'S ADDRESS

Street or P.O. Box

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. HANDLING Method (enter Code)	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste Perchloroethylene	S 0 2	F 0 0 1	6 0	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

LISA, THIS IS THE ORIGINAL WHITE COPY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983

I. GENERATOR'S EPA I.D. NUMBER

MSD-040663510

II. NAME OF INSTALLATION

Delco Remy Division, General Motors Corporation

III. INSTALLATION MAILING ADDRESS

P. O. Box 4396, Highway #11, South
Street or P. O. Box

Meridian	Mississippi	39301
City or Town	State	Zip Code

IV. LOCATION OF FACILITY (if different than section III above)

Street or Route number

City or Town	State	Zip Code

V. INSTALLATION CONTACT

Harrell, Keevin
Name (last and first)

(601) 485-5122, Ext. 2159
Phone No. (area code & no.)

VI. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Jack Matzenbacher, Plant Manager			2/27/84
Print/Type Name	Title	Signature of Authorized Representative	Date

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (CONT.)

This report is for the calendar year ending 1983

VII. GENERATOR'S EPA I.D. NO.

MSD-040663510

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)
Chemical Waste Management, Inc.

IX. FACILITY'S EPA I.D. NO.

ALD-000622464

X. FACILITY ADDRESS
P. O. Box 55
Emelle, Alabama 35459

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during the reporting period. This section to be completed only once. Do not repeat on supplemental sheets.)

Chemical Waste Management, Inc. ALD-000622464

Ensco, Inc. ARD-069748192

XII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Phosphate Corrosive Sludge Waste	02	F008	8715	P
2	Solder Flux Waste	02	D002	1660	P
3	Chromic Acid Waste	02	D002 D007	50	P
4	Trichloroethane Waste	13	F001	830	P
5	Mercury-Copper Waste	14	D009	1826	P
6	Methyl Ethyl Ketone & Paint	08	D001	415	P
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number - see instructions)

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (CONT.)

This report is for the calendar year ending 1983

VII. GENERATOR'S EPA I.D. NO.

MSD-040663510

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

American Industrial Waste

IX. FACILITY'S EPA I.D. NO.

IND-908729305

X. FACILITY ADDRESS

Industrial Drive
White Bluff, Tennessee 37187

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during the reporting period. This section to be completed only once. Do not repeat on supplemental sheets.)

XII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	PCB Liquid	15	N/A	2530	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number - see instructions)

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (CONT.)

This report is for the calendar year ending 1983

VII. GENERATOR'S EPA I.D. NO.

MSD-040663510

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)
Ensco, Inc.

IX. FACILITY'S EPA I.D. NO.

ARD-069748192

X. FACILITY ADDRESS
American Road
Ed Dorado, Arkansas 71730

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during the reporting period. This section to be completed only once. Do not repeat on supplemental sheets.)

XII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	PCB Transformer (No Liquid)	15	N/A	4350	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number - see instructions)

Georgia Environmental Protection Division
GEORGIA ANNUAL HAZARDOUS WASTE REPORT
Reporting Period January 1 thru December 31, 1983
FORM A
IDENTIFICATION

Please print/type with Elite type (12 characters per inch)

I. EPA I.D. NUMBER GAD092175377

II. NAME OF INSTALLATION
DELCO REMY DIV GM PLANT 29

III. INSTALLATION MAILING ADDRESS

P O BOX 3210
Street or P.O.Box
ALBANY GA 31705
City or Town State Zip Code

IV. LOCATION OF INSTALLATION (if different than Section III. above)

601 HOLLY DRIVE
Street or Route Number
ALBANY GA 31705
City or Town State Zip Code
DOUGHERTY
County

V. INSTALLATION CONTACT

HAHN DAVID G
Name (last and first)
912 883-8810
Phone No. (Area code & number)

VI. PROCESS IN USE (Check as appropriate)

SQG	GEN	TRN	TO1	TO2	TO3	TO4	SO1	SO2	SO3	SO4	D80	D81	D83
	X		X				X						

X PRIVATE (Handle only self generated waste) __ COMMERCIAL (Handle waste generated from other sources)

VII. CERTIFICATION - I certify under penalty of Law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

David G. Hahn, Resident Plant Engineer — 3/5/84
Print/Type Name & Title — Signature of Authorized Representative — Date Signed

Name of Installation: DELCO REMY DIV GM PLANT 29

EPA I.D. Number: GADO92325122

Form B

SELF-GENERATED HAZARDOUS WASTE AND ITS DISPOSITION

1. EPA HAZARDOUS WASTE NUMBER	D010	F001				TOTAL
2. On Hand, On-site on January 1, 1983	.531	.213				
3. Generated during 1983	1.063	.425				
4. TOTAL AMOUNT FOR WHICH TO ACCOUNT	1.594	.638				
5. Shipped to State of Alabama	1.063	.425				
6. Shipped to State of						
7. Shipped to State of						
8. Shipped to State of						
9. Shipped to Georgia Facility for Use, Reuse, Recycle or Reclaim						
10. Shipped to Georgia Facility for Treatment, Storage, or Disposal						
11. Treated On-site	0	0				
12. Treatment Code						
13. Disposed of On-site	0	0				
14. Disposal Code						
15. On Hand, On-site on December 31, 1983	.531	.213				
16. Storage Code	501	501				
17. Other (Explain)						
18. TOTAL AMOUNT OF DISPOSITION	1.594	.638				

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE FACILITY ANNUAL REPORT - PART I

1. CALENDAR YEAR COVERED 1983

2. FACILITY'S NAME G.M.C., Delco Remy Division, Plt 12

3. EPA ID NO. NJD068699107

4. MAILING ADDRESS P.O. Box 911
New Brunswick, N. J. 08903

5. STREET ADDRESS OF FACILITY 186 Jersey Avenue
New Brunswick, N. J. 08903

6. FACILITY CONTACT Albert T. Shukis PHONE NUMBER (201) 246-5120

7. CLOSURE COST ESTIMATE $ 866,700

8. POST-CLOSURE COST ESTIMATE (if applicable) $ Not applicable.

9. CERTIFICATION STATEMENT

"I certify under panalty of law that I have personally examined and am familar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties under N.J.S.A. 13:1E-1 et seq. for submitting false information, including the possibility of fine and imprisonment".

A. T. Shukis	A. T. Shukis	2-20-84
Print or Type Name	Signature	Date

10. In addition to the information required above and that required in Part II of this report, please submit the following required items: (where applicable)

A. A copy of the facility's typical waste analysis form.
B. A copy of the facility's typical daily inspection form.
C. A copy of the typical notice to a generator, required under N.J.A.C. 7:26-9.4(a)1 and a listing of all generators who received this notice (only for commercial facilities).
D. A listing of all waste shipments rejected, according to manifest number and an explanation for each rejected shipment (only for commercial facilities).
E. A listing of all manifest discrepancies and an explanation of each discrepancy (only for commercial facilities).
F. A listing of the total quantity of each waste type treated, stored, or disposed of at the facility. This listing shall include all hazardous waste accepted at the hazardous waste facility, including all on-site generated hazardous waste.
G. A listing of the total quantities of each waste type consigned to each treatment, storage, or disposal process used at the facility. This listing shall include all hazardous waste accepted at the hazardous waste facility, including all on-site generated hazardous waste.
H. A report covering all incidents that required implementing the contingency plan.

42-590 O—85——29

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE FACILITY ANNUAL REPORT - PART II

11. FACILITY EPA ID # NJD068699107

12. GENERATOR NAME On-Site

13. GENERATOR ADDRESS --

14. GENERATOR EPA ID # --

15. WASTE IDENTIFICATION

LINE NUMBER	a) DESCRIPTION OF WASTE	b) NJDEP HAZARDOUS WASTE NUMBER	c) HANDLING METHOD	d) AMOUNT OF WASTE	e) UNITS
1	Emission Control Dust from Secondary Lead Smelting	K069	SO1, MOS	621	P
2	Waste Oil - N.O.S.	X726	SO1, MOS	20,026	P
3	Lead Sludge Diatomeous Earth	D008	SO5, MOS (Truck Container)	103,220	P

Page 1 of 1

WASTE ANALYSIS PLAN

The following procedures for analyzing and characterizing of waste generated and stored at Delco Remy are to be followed for the purpose of complying with the regulations set forth in Title 40 of the Federal Register Part 265.13 (Interim Status Standards).

On or before November 19, 1980, Delco Remy surveyed all processes generating potential hazardous waste. Each waste was analyzed in comparison with parameters set forth in 40 CFR Part 261, Sub Parts C and D. Based on these parameters, the wastes were determined to be hazardous or non-hazardous. For those wastes generated which were determined to be hazardous, the following procedure must be followed:

1. A representative sample should be taken and analyzed to determine its chemical and physical characteristics (i.e., physical appearance, specific gravity, pH, vapor pressure, etc.) before shipping waste.

2. For a waste generated from a new source not included in previous survey, an evaluation must be made based on parameters set forth in Title 40 CFR Part 261, Sub Parts C and D.

3. The sampling and analytical testing should be repeated once per year or whenever the process source of waste changes.

4. The information and test results on the waste shall be properly filed in the Plant Engineering offices and remain on file for a minimum of three (3) years.

5. All sampling shall be done in accordance with methods described in Appendix I of Part 261 Title 40 CFR or other equivalent methods.

BT-314 REV. 2 (11-83)
STATE OF CALIFORNIA

P O BOX 647
SACRAMENTO, CA 95803

BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES

HAZARDOUS WASTE DISPOSAL REPORT

DUE ON OR BEFORE MARCH 1, 1984 FOR CALENDAR YEAR 1983

HA

HA HQ 36-005694

Mail to:

STATE BOARD OF EQUALIZATION
POST OFFICE BOX 647
SACRAMENTO, CA 95803

DELCO RENY
1201 N MAGNOLIA AVE P.O.BOX 3190
ANAHEIM, CA 92803-3190

This report must be filed on or before the due date shown above by every person who submitted for disposal off-site, or who disposed of on-site, hazardous waste or extremely hazardous waste in California during the above calendar year. ANY PERSON WHO KNOWINGLY REFUSES TO FILE THIS REPORT AS REQUIRED SHALL BE LIABLE, UPON CONVICTION, FOR A CIVIL PENALTY PURSUANT TO SECTION 43602 OF THE HAZARDOUS SUBSTANCES TAX LAW.

"**HAZARDOUS WASTE**" means a waste, or combination of wastes, which because of its quantity, concentration, or physical chemical, or infectious characteristics may either:

a. Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.

b. Pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

"**EXTREMELY HAZARDOUS WASTE**" means any hazardous waste or mixture of hazardous wastes which, if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the hazardous waste or mixture of hazardous wastes because of its quantity, concentration, or chemical characteristics.

HAZARDOUS WASTE CATEGORIES	TOTAL TONS (To One Decimal)
A. The total tons of **HAZARDOUS** or **EXTREMELY HAZARDOUS** waste, the Federal Regulation of which has been suspended under the Solid Waste Disposal Act by Act of Congress, disposed of, or submitted for disposal, in California, plus the total tons of waste material transferred to a surface impoundment in California for the purpose of reducing the water content of such waste and material by evaporation, plus the total tons of hazardous waste disposed of into an injection well or landfarm, exclusive of the waste reported in Section D. (NOTE: LAND FILL DISPOSAL IS NOT LAND FARMING)	
B. The total tons of **HAZARDOUS** waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, C and D.	319.3
C. The total tons of **EXTREMELY HAZARDOUS** waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, B and D.	
D. The total tons of **HAZARDOUS** or **EXTREMELY HAZARDOUS** waste disposed of, or submitted for disposal, in California from the extraction, beneficiation and processing of ores or minerals including phosphate rock and overburden from mining of uranium ore.	

I hereby certify that this report, including any accompanying schedule and statement, has been examined by me and to the best of my knowledge and belief is a true, correct, and complete report.

SIGNATURE AND TITLE F. W. Bercher Plant Manager (714) 527-2233 2/29/84
PHONE NUMBER DATE

If you have any questions regarding this report, please contact the State Board of Equalization, Excise Tax Unit, Phone (916) 445-2579.

JUN 20 RECD

GM Assembly Division

General Motors Corporation

Van Nuys Plant
8000 Van Nuys Blvd.
Van Nuys, California 91409

February 6, 1984

State Board of Equalization
P.O. Box 647
Sacramento, CA 95803

Gentlemen:

Attached is the 1983 Calendar Year Hazardous Waste Disposal Report for the GM Assembly Division - Van Nuys Plant.

All of our hazardous waste was landfilled at the BKK Corporation West Covina, California facility. Our single shipment of extremely hazardous waste (15 pounds of PCB-contaminated solids) was landfilled at the Casmalia Resources, Incorporated Santa Barbara, California facility.

Specifically, hazardous wastes generated at this plant consisted of the following:

*Paint Sludge (NA9189-ORM-E Solid)	2,142.2 Tons
*Waste Acetone (UN1090-Flammable Liquid)	584.3 Tons
*Zinc Phosphate Sludge (NA9189-ORM-E Solid)	284.4 Tons
*Miscellaneous Liquids (Gasoline, Hypochlorite, etc.)	17.4 Tons
*Miscellaneous Solids (Contaminated drums, etc.)	80.3 Tons
TOTAL	3,108.6 Tons

If further information is required, please contact Glenn Aro, Senior Environmental Engineer at (818) 997-5091.

Sincerely,

Dennis G. Heinemann

Dennis G. Heinemann
Director of Plant Engineering

GSA:DGH:im

cc: C.E. Brown
G.S. Aro

BT 314 REV. 2 (11-83)
STATE OF CALIFORNIA

P O BOX 647
SACRAMENTO, CA 95803

BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES

HAZARDOUS WASTE DISPOSAL REPORT

DUE ON OR BEFORE MARCH 1, 1984 FOR CALENDAR YEAR 1983 a

c HA

MA HQ 36-006340 b

A

Mail to

STATE BOARD OF EQUALIZATION
POST OFFICE BOX 647
SACRAMENTO, CA 95803

GM ASSEMBLY DIVISION - GM CORP
8000 VAN NUYS BLVD
VAN NUYS, CA 91409

GENERATING SITE: VAN NUYS PLANT

This report must be filed on or before the due date shown above by every person who submitted for disposal off-site, or who disposed of on-site, hazardous waste or extremely hazardous waste in California during the above calendar year. ANY PERSON WHO KNOWINGLY REFUSES TO FILE THIS REPORT AS REQUIRED SHALL BE LIABLE, UPON CONVICTION, FOR A CIVIL PENALTY PURSUANT TO SECTION 43802 OF THE HAZARDOUS SUBSTANCES TAX LAW.

"**HAZARDOUS WASTE**" means a waste, or combination of wastes, which because of its quantity, concentration, or physical chemical, or infectious characteristics may either:

a. Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.

b. Pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

"**EXTREMELY HAZARDOUS WASTE**" means any hazardous waste or mixture of hazardous wastes which, if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the hazardous waste or mixture of hazardous wastes because of its quantity, concentration, or chemical characteristics.

HAZARDOUS WASTE CATEGORIES	TOTAL TONS *(To One Decimal)*
A. The total tons of **HAZARDOUS** or **EXTREMELY HAZARDOUS** waste, the Federal Regulation of which has been suspended under the Solid Waste Disposal Act by Act of Congress, disposed of, or submitted for disposal, in California, plus the total tons of waste material transferred to a surface impoundment in California for the purpose of reducing the water content of such waste and material by evaporation, plus the total tons of hazardous waste disposed of into an injection well or landfarm, exclusive of the waste reported in Section D. (NOTE: LAND FILL DISPOSAL IS NOT LAND FARMING)	-0-
B. The total tons of **HAZARDOUS** waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, C and D.	3108.6
C. The total tons of **EXTREMELY HAZARDOUS** waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, B and D.	< 0.1
D. The total tons of **HAZARDOUS** or **EXTREMELY HAZARDOUS** waste disposed of, or submitted for disposal, in California from the extraction, beneficiation and processing of ores or minerals including phosphate rock and overburden from mining of uranium ore.	-0-

I hereby certify that this report, including any accompanying schedule and statement, has been examined by me and to the best of my knowledge and belief is a true, correct, and complete report.

SIGNATURE AND TITLE Dennis D. Kelinen
Director of Plant Engineering

(818) 997-5091 2-6-84
PHONE NUMBER DATE

If you have any questions regarding this report, please contact the State Board of Equalization, Excise Tax Unit, Phone (916) 445-2579

BT-314 REV. 2 (11-83)
STATE OF CALIFORNIA

P O BOX 647
SACRAMENTO, CA 95803

BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES

HAZARDOUS WASTE DISPOSAL REPORT

DUE ON OR BEFORE MARCH 1, 1984 FOR CALENDAR YEAR 1983

HA

HA HO 36-005134

Mail to

STATE BOARD OF EQUALIZATION,
POST OFFICE BOX 647
SACRAMENTO, CA 95803

GENERAL MOTORS CORP
45500 FREMONT BLVD
FREMONT, CA 94537

This report must be filed on or before the due date stated above by every person who submitted for disposal off site, or who disposed of on site, hazardous waste or extremely hazardous waste in California during the above calendar year. ANY PERSON WHO KNOWINGLY REFUSES TO FILE THIS REPORT AS REQUIRED SHALL BE LIABLE, UPON CONVICTION, FOR A CIVIL PENALTY PURSUANT TO SECTION 43032 OF THE HAZARDOUS SUBSTANCES TAX LAW.

"HAZARDOUS WASTE" means a waste, or combination of wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may either

a. Cause or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.

b. Pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

"EXTREMELY HAZARDOUS WASTE" means any hazardous waste or mixture of hazardous wastes which, if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the hazardous waste or mixture of hazardous wastes because of its quantity, concentration, or chemical characteristics.

HAZARDOUS WASTE CATEGORIES	# TOTAL TONS (To One Decimal)
A. The total tons of HAZARDOUS or EXTREMELY HAZARDOUS waste, the Federal Regulation of which has been suspended under the Solid Waste Disposal Act by Act of Congress, disposed of, or submitted for disposal, in California, plus the total tons of waste material transferred to a surface impoundment in California for the purpose of reducing the water content of such waste and material by evaporation, plus the total tons of hazardous waste disposed of into an injection well or landfarm exclusive of the waste reported in Section D (NOTE: LAND FILL DISPOSAL IS NOT LAND FARMING)	31.4 T
B. The total tons of HAZARDOUS waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, C and D	224.8 T
C. The total tons of EXTREMELY HAZARDOUS waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, B and D	
D. The total tons of HAZARDOUS or EXTREMELY HAZARDOUS waste disposed of, or submitted for disposal, in California from the extraction, beneficiation and processing of ores or minerals including phosphate rock and overburden from mining of uranium ore	

I hereby certify that this report, including any statements, schedule and statement, has been examined by me and to the best of my [illegible] correct and complete report.

SIGNATURE AND TITLE: R. L. SUTHERLIN, FACILITIES ENGINEER (415) 498-5522

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 4

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [X] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME G.M.C. Chevrolet Tonawanda Plants

STREET P. O. Box 21

CITY Buffalo STATE New York ZIP CODE 14240

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] - [ ]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER N Y D 0 4 9 8 3 6 6 7 9 NYSDEC Facility I.D. No. [ ]

NAME S.C.A. Chemical Services

STREET 1135 Balmer Road

CITY Model City STATE New York ZIP CODE 14107

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
P.C.B. Oil form Transformer	B 0 1 0 1	0 1	S 0 2	4 5 4	0 1	0 2
One (1) Transformer with P.C.B. Liquid Removed	B 0 1 0 5	0 2	D 8 0	1 0 3 0 0	0 3	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME D. L. Rust TITLE Plant Manager

SIGNATURE D. L. Rust DATE 2-9-84

47-15-17 (12/83)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 4

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME G.M.C. Chevrolet Tonawanda Plants

STREET P. O. Box 21

CITY Buffalo STATE New York ZIP CODE 14240

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No [ ] - [ ]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER T N D 9 8 0 7 2 9 3 0 5 NYSDEC Facility I.D. No [ ]

NAME Ensco Incorporated

STREET Industrial Drive

CITY White Bluff STATE Tennessee ZIP CODE 37187

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
P.C.B. Capacitors	B 0 0 7	0 2	T 0 6	1 2 8 3 0	0 3	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME D. L. Rust TITLE Plant Manager

SIGNATURE D. L. Rust DATE 2-9-84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 3 of 4

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME G.M.C. Chevrolet Tonawanda Plants
STREET P.O. Box 21
CITY Buffalo STATE New York ZIP CODE 14240

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] - [ ]
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER N Y D 0 8 0 3 3 6 2 4 1 1 NYSDEC Facility I.D. No. [ ]
NAME Cecos International
STREET 56th Street and Pine Avenue
CITY Niagara Falls STATE New York ZIP CODE 14303

(5) WASTE DESCRIPTION	WASTE INFORMATION (6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
One (1) Transformer Cooling Fin with P.C.B. liquid removed	B 0 0 5	0 2	D 8 1	4 7 8	0 3	0 2
P.C.B. Contaminated Soil	B 0 0 4	0 2	D 8 1	1 3 6 0	0 3	0 2
P.C.B. Contaminated Rags and Plastic Pieces	B 0 0 6	0 2	D 8 1	1 3 7	0 3	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME D. L. Rust TITLE Plant Manager
SIGNATURE D. L. Rust DATE 2-9-84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 4 of 4

(2) [X] GENERATOR EPA ID NUMBER [redacted] 47 15 17 OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME G.M.C. Chevrolet Tonawanda Plants

STREET P. O. Box 21

CITY Buffalo STATE New York ZIP CODE 14240

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] - [ ]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER N Y T 0 9 9 0 1 2 8 0 7 NYSDEC Facility I.D. No. [ ]

NAME Voelker Analysis, Inc.

STREET 766 Babcock

CITY Buffalo STATE New York ZIP CODE 14206

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
1,1,1, - Trichloroethane	F 0 0 1	0 1	T 5 4	2 5 0	0 1	0 2
1,1,1, - Trichloroethane	F 0 0 1	0 1	T 5 4	4 0 0	0 1	0 2

NOTE:
Handling method T54
Distillation for reuse

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME D. L. Rust TITLE Plant Manager

SIGNATURE D. L. Rust DATE 3-9-84

DO not make entries in shaded areas

OMB o: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

TAC

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
F	M	I	D	0	0	5	3	5	6	8	4	5		T

III. NAME OF INSTALLATION

| 30 | | |

DO NOT make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

1	2										11	14	15
G	M	I	D	0	0	5	3	5	6	8	4	5	1

X. FACILITY'S EPA I.D. NO.

16											28
F	M	I	D	0	6	0	9	7	5	8	4	4	

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chemical Recovery Systems

XI. FACILITY ADDRESS

36345 Van Born Rd.
Romulus, MI. 48174

XII. TRANSPORTATION SERVICES USED

Chemical Recovery Systems MID060975844

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	1,1,1 Trichloroethane	1 3 (33 34)	F 0 0 1 (35 38) (39 42)	4 6 8 8 8 (43 51 59)	P (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

DO NOT MAKE ENTRIES IN SHADED AREAS

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

1	2										11	12	13	14	15
C	A	T	N	0	0	5	3	5	6	8	4	5		1	

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

16											28

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. DOT Hazard code (33–34)	C. EPA Hazardous Waste No. (see instructions) (35–42)	D. Amount of Waste (43–50)	E. Unit of Measure (51)
	1	1, 1, 1 Trichloroethane	1, 3	F, 0, 0, 1	7, 5, 6, 3	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

"1983" Generated - Stored On-Site Less Than 90 Days As Of December 31, 1983

DO NOT MAKE ENTRIES IN SHADED AREAS

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C	M	I	D	0	0	5	3	5	6	8	4	5		1
1	2											11	14	15

X. FACILITY'S EPA I.D. NO.

F	M	I	D	0	0	6	5	2	3	8	5	
16											28	

XII. TRANSPORTATION SERVICES USED

Environmental Management Corp.

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

U.S. Chemical

XI. FACILITY ADDRESS

29163 Callahan St.
Roseville, MI. 48066

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Compound, Lacquer, Paint, or Varnish Removing, Reducing or Thinning Liquid	0 8 31 34	D 0 0 1 35 38 39 42	1 5 7 3 47 51 59	P 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

DO NOT MAKE ENTRIES IN SHADED AREAS

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G	M	I	D	0	0	5	3	5	6	8	4	5		T
1	2										13	14	15	

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

F												
16												28

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Compound, Lacquer, Paint or Varnish Removing, Reducing or Thinning Liquid	0 8 33 34	D 0 0 1 35 38 39 42	1 7 0 43 46 47 50 51 59	P 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number --see instructions)

"1983" Generated - Stored On-Site Less Than 90 Days As Of December 31, 1983.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

Tear out here

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T/A C

(1) M I D 0 1 0 5 1 3 5 1 6 1 6 1 2 1 1

1 2 13 14 15

CBS ENTRY (OFFICIAL USE ONLY) ☐

III. NAME OF INSTALLATION

(2) C H E V R O L E T M O T O R D I V L I V O N I A P L A N T

30 69

IV. INSTALLATION MAILING ADDRESS

(3) 1 3 0 0 0 E C K L E S R O A D

15 16 45

Street or P.O. Box

(4) L I V O N I A M I 4 8 1 5 1

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section I / above)

(5)

15 16 45

Street or Route number

(6)

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

(7) L A W S O N R O B E R T

15 16 45

Name (last and first)

3 1 3 – 4 6 4 – 5 2 0 0

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

E.H. WARR-Plant Manager X _____ 2-20-84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

42-590 O—85——30

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 6 2 1 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chemical Recovery System Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 6 0 9 7 6 8 5 5

XI. FACILITY ADDRESS

36345 Van Born Rd
Romulus, Michigan 48174

XII. TRANSPORTATION SERVICES USED

Wolverine Disposal Inc. MID 086148202

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Flammable Liquid N.O.S.	08	D001	0.83	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Page 2 of 5

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 8 6 6 6 2 1 (T/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Michigan Disposal Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 0 7 2 4 8 3 1

XI. FACILITY ADDRESS

49350 N. Service Drive
Belleville, Michigan 48111

XII. TRANSPORTATION SERVICES USED

Stock Brothers Inc. MID 017378142
Wolverine Disposal Inc. MID 086148202
Astro Oil Corporation MID 060975315

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Lead Chromate Sludge	1,5	D002 D008 D007	99.57	T
	2	Corrosive Liquid	1,5	D002	16.59	T
	3	Lead Chromate Sludge	1,5	D007 D008	59.08	T
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Page 3 of 5

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 6 2 1 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Woodland Meadows Landfill

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 0 8 1 0 4 0 8

XI. FACILITY ADDRESS

4620 Hannan Rd.
Canton, Michigan 48188

XII. TRANSPORTATION SERVICES USED

Waste Management of Michgian MID 072790546

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Hazardous Waste Solid (Sludge)	15	U003	3432	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

(G) M I D 0 0 0 5 3 5 6 6 2 1 [ ] 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal Inc. Site #2

X. FACILITY'S EPA I.D. NO.

(F) M I D 0 4 8 0 9 0 6 3 3

16 28

XI. FACILITY ADDRESS

49350 N. Service Drive
Belleville, Michigan 48111

XII. TRANSPORTATION SERVICES USED

Waste Management of Michigan - West	MID 072790546
Wolverine Disposal Inc.	MID 086148202

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Hazardous Waste Solid (Sludge)	1 5 (33 34)	F 0 0 3 (35 38) (39 42)	3 9 6 (43 46) (47 50) (51 59)	T (60)
	2	Chrome Contaminated Waste	1 5	D 0 0 2 / D 0 0 7	1 7 3	T
	3	Chrome Contaminated Waste	1 5	D 0 0 7	1 0 9 9	T
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Form 5

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

INDOO6066286
GMC Chevrolet Muncie
P.O. Box 2527
Muncie

201

IN 47302

FORM E: Installation Identification Form

ENVIRONMENTAL MANAGEMENT BOARD

INSTRUCTIONS: Please refer to the specific instructions before completing this form. The information requested herein is required by IC 13-7-8.5-2.

I. TYPE OF HAZARDOUS WASTE REPORT FOR THE YEAR ENDING DEC. 31, 19 83

FORM G: GENERATOR ANNUAL REPORT	[X]	FORM F: FACILITY ANNUAL REPORT	[X]
DID NOT GENERATE/TSD HAZARDOUS WASTE	[ ]	SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE	[ ]

II. INSTALLATION'S EPA I.D. NUMBER

III. NAME OF INSTALLATION

IV. INSTALLATION MAILING ADDRESS

Street or P. O. Box

City or Town

State | Zip Code

V. LOCATION OF INSTALLATION

Street or P. O. Box: 1200 WEST 8TH ST

City or Town: MUNCIE

State: IN | Zip Code: 47302 | County: DELAWARE

VI. INSTALLATION CONTACT

Last Name	First Name	Phone (area code & no.)
ENGELMANN	MARVIN	317/747-2252

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(A.) PRINT OR TYPE NAME	(B.) SIGNATURE	(C.) DATE SIGNED
CLAUDE N. ROWAN		

Please print or type with ELITE type (12 characters per inch).

SF/166-001 State Form 19380 R
Revised 10/82

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 0 | 6 | 6 | 2 | 8 | 6 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) | FACILITY'S EPA ID NUMBER

XI. FACILITY'S ADDRESS

Street or P. O. Box

City or Town | State | Zip

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1					P T
2					P T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

GMC Chevrolet Muncie did not ship any hazardous waste off-site for treatment, storage or disposal during calendar year 1983. All hazardous wastes were stored on-site pending off-site disposal.

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 __

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) FACILITY'S EPA ID NUMBER

XI. FACILITY'S ADDRESS

Street or P. O. Box

City or Town State Zip

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1					P T
2					P T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

PAGE ___ OF ___

State Form 19286R
Revised 10/82

MAY BE PHOTOCOPIED

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

Y/AC

(1) F O H D 0 8 6 6 6 3 1 0 1 Y

1 2 13 14 15

II. NAME OF INSTALLATION

(2) G MC C H E V R O L E T M O T O R D I V I S I O N

30 67

III. INSTALLATION MAILING ADDRESS

(3) P O B O X 3 0 0 9 8

15 16 45

Street or P.O. Box

(4) C L E V E L A N D O H 4 4 1 3 0

15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

(5) 5 4 0 0 C H E V R O L E T B O U L E V A RD 1 8

15 16 45 47 48

County Code

(6) P A R M A O H 4 4 1 3 0 3 7 1 4

15 16 41 42 47 51 53 58

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

(7) M A S O N T H O M A S 2 1 6 - 2 6 5 - 5 3 6 2

15 16 45 46 51

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year.

Van Waters & Rogers
OHD094507415

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. L. Lints	Plant Mngr.	Robert L. Lints	2/1/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA 8010 Page 1 of 4

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C O H D 0 8 6 6 6 3 1 0 1 4 2

IX. FACILITY'S EPA I.D. NO.

O H D 0 6 6 0 6 0 6 0 9

X. FACILITY NAME

CHEMTRON INCORPORATED

XI. FACILITY'S ADDRESS

3 5 8 5 0 SCHNEIDER COURT

Street or P.O. Box

AVON OH 4 4 0 1 1

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Spent 1,1,1 Trichloroethane	1 2	F 0 0 1	2 4 7 0	K
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Waste indicated is not retained in storage by Generator in excess of ninety days. Facility should be considered a small quantity Generator. A letter requesting Interim Status withdrawal was submitted to OEPA on September 9, 1982.

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
F	O	H	D	O	8	6	6	6	3	1	0	1	1	9

II. NAME OF INSTALLATION

| 30 | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

TAC

C O H D 0 8 6 6 3 1 0 1 2

IX. FACILITY'S EPA I.D. NO.

K Y D 0 5 3 4 8 1 0 8

X. FACILITY NAME

MCKESSON ENVIRONMENTAL SYSTEMS

XI. FACILITY'S ADDRESS

STATE HIGHWAY 146

Street or P.O. Box

NEW CASTLE KY 40050

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Spent 1, 1, 1 Trichloroethane	1 2	F 0 0 1		
2				3 5 6 8	K
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Waste indicated is not retained in storage by Generator in excess of ninety days. Facility should be considered a small quantity Generator. A letter requesting Interim Status withdrawal was submitted to OEPA on September 9, 1982.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other_____

(330) ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

M I D 0 0 5 3 5 6 9 5 1 (N/A)

(F) 1 2 13 14 15

III. NAME OF INSTALLATION

G M C C H E V R O L E T F L I N T V A N S L Y K E C O M P L E X

30 69

IV. INSTALLATION MAILING ADDRESS

(3) G - 3 2 4 8 V A N S L Y K E R D.

15 16 45

Street or P.O. Box

(4) F L I N T M I 4 8 5 5 2

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(5) 15 16 45

Street or Route number

(6) 15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

(7) R I C H A R D G A W R Y C H

15 16 45

Name (last and first)

3 1 3 7 6 6 1 4 5 0

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

P. PIERCE PLANT MANAGER 2-13-84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(3-80) (Revised 11-81)

Page 1 of ____

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.
M I D 0 0 5 3 5 6 9 5 [illegible]
(G) 1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
MICHIGAN DISPOSAL

X. FACILITY'S EPA I.D. NO.
M I D 0 0 7 2 4 8 3 1
(F) 16 28

XI. FACILITY ADDRESS
49350 N. SERVICE DR.
BELLEVILLE, MI 48111

XII. TRANSPORTATION SERVICES USED
C.J. RODGERS
3328 TORREY RD., FLINT MI
MID 270012347

MIT 2700019672
J&W LEASING
2277 GRAND BLANC RD.
GRAND BLANC., MI 48439

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	SOLID N.O.S. ORME WASTEWATER TREATMENT SLUDGE	15	F 0 0 6	2 3 5 1	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Page ___ of ___

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.
M I D 0 0 5 3 5 6 9 5 9 1
(G) 1 2 13 14 15 (F)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
WAYNE DISPOSAL

X. FACILITY'S EPA I.D. NO.
M I D 0 4 8 0 9 0 6 3 3
(F) 16 28

XI. FACILITY ADDRESS
49350 SERVICE DR.
BELLEVILLE MI 48111

XII. TRANSPORTATION SERVICES USED
VALLEY RUBBISH
3323 ASSOCIATES DR. FLINT MI 48507
MIT 270010432

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	SOLID N.O.S. ORME WASTEWATER TREATMENT SLUDGE	15	F 0 0 6 (35 38 39 42)	5.0 (43 46 47 50 51 59)	T (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

(29 32)

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Page ____ of ____

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

MIDOO5356951411

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

U.B. Chemical

X. FACILITY'S EPA I.D. NO.

FMIDOO65238 5

XI. FACILITY ADDRESS

29163 Callahan
Roseville, Michigan
(313) 778-1414

XII. TRANSPORTATION SERVICES USED

U.S. Chemical
29163 Callahan
Roseville, Michigan (313) 775-1414
MID 006523385

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste solvent n.o.s.	07	F002 F003 F005	400	T
	2	Waste Compound Paint Thinning Liquid	07	F002 F003 F005	875	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Page of

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 9 5 3 (TAC 11)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal

XI. FACILITY ADDRESS

49350 N. Service Dr.
Belleville, Michigan
(313) 697-2200

X. FACILITY'S EPA I.D. NO.

F M I D 0 4 8 0 9 0 6 3 3

XII. TRANSPORTATION SERVICES USED

Valley Rubbish & Removal
3323 Associates Dr.
Flint, Michigan (313) 743-7430
Mir 270010432

XIII. WASTE IDENTIFICATION

Sequence #	No.	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste phosphate, sealer and Paint sludge, wastewa ter treatment sludge	1 5	F 0 0 6 F 0 1 7	2 0 4 0	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 9 5 1 (T/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Michigan Disposal

XI. FACILITY ADDRESS

49350 N. Service Dr.
Belleville, Michigan
(313) 697-2200

X. FACILITY'S EPA I.D. NO.

M I D 0 0 0 7 2 4 8 3 1

XII. TRANSPORTATION SERVICES USED

Valley Rubbish & Removal
3323 Associates Dr.
Flint, Michigan (313) 743-7430
MIT 3700104332

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	Waste phosphate, Sealer and Paint Sludge, Wastewater treatment Sludge	1,5	F,0,0,6	F,0,2,7	2,0	T
	2						
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

Year out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G | M I D 0 0 5 3 5 6 9 5 3 | T/A/C
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal

XI. FACILITY ADDRESS

49350 N. Service Dr.
Belleville, Michigan
(313) 697-2200

X. FACILITY'S EPA I.D. NO.

F | M I D 0 4 8 0 9 0 6 3 3
1h 2h

XII. TRANSPORTATION SERVICES USED

Wolverine Disposal Inc.
1060 Rawsonville Road
Ypsilanti, Michigan 48197 (313) 481-0020

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste phosphate, sealer and Paint sludge wastewater treatment sludge	15	F 0 0 6 F 0 1 7	2 0	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C|M|I|D|0|0|5|3|5|6|9|5|1| T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro-Chem

XI. FACILITY ADDRESS

421 Lycaste Street
Detroit, Michigan
(313) 824-1988

X. FACILITY'S EPA I.D. NO.

F|M|I|D|9|8|0|6|1|5|2|9|8|

XII. TRANSPORTATION SERVICES USED

Drury Brothers
11950 E. Newburg Road
Durand, Michigan (517) 288-2070
MIO 05698 8892

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	Waste Solvent n.o.s.	0,7	F,0,0,2 / F,0,0,5	F,0,0,3	2,5	T
	2	Waste Paint Enamel	0,7	F,0,0,3 / F,0,0,2	F,0,0,5	1,2	T
	3	Waste Petroleum Naphtha	0,7	F,0,0,3 / F,0,0,2	F,0,0,5	6,9	T
	4	Waste Methylene Chloride	0,7	F,0,0,2 / F,0,0,5	F,0,0,3	9,8	T
	5	Waste Compound Paint Thinning Liquid	0,7	F,0,0,2 / F,0,0,5	F,0,0,3	2,3,2	T
	6						
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C
OHD 005 396 951 (11)
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Byetec

XI. FACILITY ADDRESS

Box 266
Paulding, Ohio

X. FACILITY'S EPA I.D. NO.

FOHD 005 018 947
16 28

XII. TRANSPORTATION SERVICES USED

Drury Brothers
11950 E. Newburg Road
Durand, Michigan (517) 288-2020
MID 054988912

XIII. WASTE IDENTIFICATION

Sequence #	In/Out	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1		Waste Petroleum Naphtha (Flowcoat Thinner)	07	F002 F003	22	P
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters/inch).

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T/A/C

C|A|D|0|6|4|5|7|3|2|5|6|E|T|A
1 2 13 14 15

FOR OFFICIAL USE ONLY

III. NAME OF INSTALLATION

G|M|C| |C|H|E|V|R|O|L|E|T| |A|D|R|I|A|N| |M|F|G| | | |

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C|M|T|D|0|8|4|5|7|2|5|6|F|1|
T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Commercial Oil Service

X. FACILITY'S EPA I.D. NO.

F|0|H|D|0|0|0|8|1|6|8|4|3|

XI. FACILITY ADDRESS

5911 Seaman Rd.
Oregon, Ohio 43616

XII. TRANSPORTATION SERVICES USED

Commercial Oil Service, EPA I.D. #-OHD000816843

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Mixture of spent non-halogenated paint solvents	0 8	F 0 0 3 / F 0 0 5	1 2 0 4 0 0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number –see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C
M I D 0 8 4 5 7 1 2 5 6
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

16 28

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
01 32	1	Mixture of spent non-halogenated paint solvents	0 8 33 34	F 0 0 3 35 38 F 0 0 5 39 42	1 0 4 0 0 43 50 51	P 60
	2			43 46 47 50	51 59	60
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number--see instructions)

1983 Generated --Stored on-site less than 90 days as of December 31, 1983.

Tear out here

Do not make entries in shaded areas — Expires 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

(1) M I D 0 0 5 3 5 6 6 8 8 | 1 | (2)
1 2 13 14 15

C303 ENTRY (OFFICIAL USE ONLY) D

III. NAME OF INSTALLATION

(3) Chevrolet Bay City
30 69

IV. INSTALLATION MAILING ADDRESS

(3) 100 Fitzgerald Street
15 16 45

Street or P.O. Box

(4) Bay City | | |

Do not make entries in shaded areas.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 6 8 8 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 Allen Rd.
Wyandotte, Mi. 48204

XII. TRANSPORTATION SERVICES USED

Chem-Met

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Chromium & Compounds from stripper operation	1 5	D 0 0 7	3 2 4 8	K
	2	Solvent from cleaning operation	0 8	D 0 0 1 / D 0 0 8	9 6 1 8	K
	3	Paint from paint wastes	0 8	D 0 0 1	8 1 8	K
	4	Zinc & Compounds from over chromated scrap	1 5	D 0 0 3	3 1 9 2	K
	5	Adhesive left over from a discontinued operation	0 8	F 0 0 5 / D 0 0 1	1 2 1	K
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 6 8 8 T/A C (1)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chevrolet Bay City

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 5 3 5 6 6 8 8

XI. FACILITY ADDRESS

100 Fitzgerald Street
Bay City, MI. 48707

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Chromium & Compounds from stripper operation	1 5	D 0 0 7	2 1 6 5	K
	2	Solvent from cleaning operation	0 8	D 0 0 1 D 0 0 8	1 0 2 3	K
	3	Paint from paint wastes	0 8	D 0 0 1	6 1 4	K
	4	Zinc & Compounds from over chromated scrap	1 5	D 0 0 3	2 9 0	K
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

1983 Generated - Stored on site as of Dec 31, 1983

Tear out here

Do not make entries in shaded areas OMB at 2060-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Explain your non-regulated status in the space below.

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

T A C

MIDO05356888 1

1 2 13 14 15

This Facility's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other (explain in comment section)

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

Chevrolet Bay City

30 69

IV. FACILITY MAILING ADDRESS

3100 Fitzgerald Street

15 16 45

Street or P.O. Box

4 Bay City MI 48707

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

5

15 16 45

Street or Route number

6

15 16 41 42 47 51

City or Town State Zip Code

VI. FACILITY CONTACT

2 Lee Edward

15 16 45

Name (last and first)

VII. COST ESTIMATES FOR FACILITIES

517-894-7380

46 55

Phone No. (area code & no.)

A. Cost Estimate for Facility Closure: $ 8,800 (16 19 22)

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only): $. (25 28 31)

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

William F. Charrey	Plant Manager	W D Charrey	2-10-84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8700-13B(5-80) (Revised 11-83)

Page 1 of 2

Tear out here

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No 1 of 4

(2) [X] GENERATOR EPA ID NUMBER NYD 002127165 OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME GMC, Chevrolet-Duffalo

STREET 1001 E. Delavan Avenue

CITY Buffalo STATE NY ZIP CODE 14215

(3) [ ] TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER NYD 991291787 NYSDEC Facility I.D. No. 15M07

NAME Voelker Analysis, Inc.

STREET 766 Babcock Street

CITY Buffalo STATE NY ZIP CODE 14206

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Spent 1,1,1-Trichloroethane and	F001	01	T54	9000	03	02
Chlorinated Fluorocarbons from						
Degreasing Operations						

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME L. A. Wood TITLE Plant Manager

SIGNATURE L. A. Wood DATE 2/27/84

47-15-17 (12/83)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 4

(2) [X] GENERATOR EPA ID NUMBER NYD012712168 OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME GMC, Chevrolet-Buffalo
STREET 1001 E. Delavan Avenue
CITY Buffalo STATE NY ZIP CODE 14215

(3) [ ] TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER NYD080336241 NYSDEC Facility I.D. No. 932102
NAME CECOS International
STREET 56th Street & Niagara Falls Boulevard
CITY Niagara Falls STATE NY ZIP CODE 14303

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Cooker Waste Oil, Hazardous Waste	D018	01	D81	3950	01	02
Liquid, NOS	D019					
Cooker Waste Oil, Hazardous Waste	D018	01	S01	853	01	02
Liquid, NOS	D019					

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME L. A. Wood TITLE Plant Manager

SIGNATURE L.A. Wood DATE 2/27/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 3 of 4

(2) [X] GENERATOR EPA ID NUMBER NYD 012127168 OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME GMC, Chevrolet-Buffalo

STREET 1001 E. Delavan Avenue

CITY Buffalo STATE NY ZIP CODE 14215

(3) [ ] TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER NYD 041936171 NYSDEC Facility I.D. No. 32810

NAME SCA Chemical Services

STREET 1550 Balmer Road

CITY Model City STATE NY ZIP CODE 14107

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
PCB Capacitors	B007	02	D81	6768	03	02
PCB Capacitors	B007	02	T07	407	03	02
PCB Contaminated Paper & Rags	B006	02	T07	10	03	02
Other PCB Wastes (Lighting Ballasts)	B009	02	D81	353	03	02

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME L. A. Wood TITLE Plant Manager

SIGNATURE L. A. Wood DATE 2/27/89

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 4 of 4

(2) [X] GENERATOR EPA ID NUMBER NIYID 0 1 2 1 2 7 1 1 6 5 OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME GMC, Chevrolet-Buffalo

STREET 1001 E. Delevan Avenue

CITY Buffalo STATE NY ZIP CODE 14215

(3) [ ] TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER NIYID 0 6 7 5 3 1 9 9 4 0 NYSDEC Facility I.D. No.

NAME General Electric Co.

STREET 175 Milens Road

CITY Tonawanda STATE NY ZIP CODE 14150

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
PCB Transformer, Liquid	B 0 1 1	0 1	T 0 1	8 6 7	0 1	0 2
PCB Transformer, Hulk	B 0 1 1	0 2	D 8 1	1 1 5 5 0	0 3	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME L. A. Wood TITLE Plant Manager

SIGNATURE L. A. Wood DATE 2/27/84

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

F	M	I	D	0	2	0	1	0	5	5	6	5		1
1	2											13	14	15

1983 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

| O | M | C | | C | H | E | V | R | O | L | E | T | | D | E | T | R | O | I | T | | F | O | R | G | E | | | | | | | | | | |

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 2 0 1 0 5 5 6 5 E T A C
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

F
16 28

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	CORROSIVE SLUDGE FROM COATING OPERATION OF STEEL FOR EXTRUSION	0 2	D 0 0 2 D 0 0 7 D 0 0 9 D 0 1 0	4 6 7 2 8	P
	2	SLUDGE FROM ELECTRICAL DISCHARGE MACHINING	1 5	D 0 0 7 D 0 0 8 D 0 0 9	5 0 4 4 5	P
	3	SPENT 1.1.1 TRICHLOROETHANE	0 8	U 2 2 6	2 4 2 0	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

X111. TOTAL WASTE GENERATED, MINUS OVER 90 DAY STORAGE REPORTED ON TSD FACILITY REPORT

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C

M I D 0 2 0 0 1 0 5 5 6 5 T A C

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENVIRONMENTAL WASTE CONTROL, INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 5 7 0 0 2 6 0 2

16 28

XI. FACILITY ADDRESS

27140 PRINCETON
INKSTER, MICHIGAN 48141

XII. TRANSPORTATION SERVICES USED

ENVIRONMENTAL WASTE CONTROL, INC.
MID 057002602

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1	CORROSIVE SLUDGE FROM COATING OPERATION OF STEEL FOR EXTRUSION	02	D002 D007 D008	3825	P
2	2	SLUDGE FROM ELECTRICAL DISCHARGE MACHINING	15	D007 D009	4407.3	P
3	3	SPENT 1,1,1 TRICHLOROETHANE	08	U226	240	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

XIII. TOTAL WASTE SHIPPED DURING 1983.

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A/C

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
C	M	T	I	D	0	1	2	0	1	1	0	1	5	5	6	1	5	F	1	1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

16												28
F												

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
25 12	1	CORROSIVE SLUDGE FROM COATING OPERATION OF STEEL FOR EXTRUSION	2	D002 D007 D008	6003	P
	2	SLUDGE FROM ELECTRICAL DISCHARGE MACHINING	6	D007 D008	6372	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

XIII. "1983 GENERATED - - STORED ON-SITE LESS THAN 90 DAYS AS OF DECEMBER 31, 1983.

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with the type 12 characters per inch.

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other ___

II. GENERATOR'S EPA I.D. NUMBER

T A C

(F|M|I|D|0|8|6|7|4|4|8|0|2|T|T) (1 2 13 14 15)

III. NAME OF INSTALLATION

(G|M|C| |C|H|E|V|R|O|L|E|T| |D|E|T|R|O|I|T| |G|E|A|R| |A|N|D| |A|X|L|E|) (30 69)

IV. INSTALLATION MAILING ADDRESS

(8|1|8|4|0| |H|O|L|B|R|O|O|K| |A|V|E|) (15 16 45)

Street or P.O. Box

(A|D|E|T|R|O|I|T|) (15 16) (MI|T| 41 42) (4|8|2|1|2| 47 51)

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(5|) (15 16 45)

Street or Route number

(6|) (15 16 41 42 47 51)

City or Town State Zip Code

VI. INSTALLATION CONTACT

(2|D|O|N|A|L|D| |J|O|H|N|S|T|O|N|) (15 16 45)

Name (last and first)

(3|1|3|-|5|5|6|-|9|6|0|1) (46 55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

for R. G. McGarry, Plant Manager — 1/25/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T A C

1	2											13	14	15
C	M	I	D	0	8	6	7	4	4	8	0	2	1	1

X. FACILITY'S EPA I.D. NO.

16											28
F	M	I	D	0	9	6	9	6	3	1	9	4

XII. TRANSPORTATION SERVICES USED

CHEM-MET SERVICES INC. MID 096963194

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MICH. 48192

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	WASTE PAINT AND WATER	0,1	D,0,0,1	2,0,8,1,3,8	P
	2	WASTE PAINT AND FILTERS	0,1	D,0,0,1	3,4,0,3,0	P
	3	WASTE PAINT AND WATER	0,1	D,0,0,1	4,8,0,0,0	P
	4	WASTE PAINT	0,7	D,0,0,1	5,4,4,5	P
	5	WASTE PAINT	0,1	D,0,0,1	2,5,9,6,0	P
	6	WASTE CHLORINATED SOLVENTS	1,2	F,0,0,2	1,5,4,2,0	P
	7	WASTE DIESEL FUEL	0,1	D,0,0,1	3,1,6,8	P
	8	WASTE ROOFING COMPOUND	0,1	D,0,0,1	2,3,5,0	P
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

1. Ignitable Paint and Water from Spray Booth (Mineral Spirits Base)
2. Ignitable Paint and Filters from Spray Booth (Water Base)
3. Ignitable Paint and Water from Spray Booth (Water Base)
4. Ignitable Paint from Spray Booth (Naptra Base)
5. Ignitable Paint from Maintenance Operations (Mineral Spirits Base)
6. Chlorinated Solvents from Degreasing Operations
7. Diesel Fuel from Contaminated Tank
8. Roofing Compound from Maintenance Roof Repairs

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 8 6 7 4 4 8 0 2 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENVIRONMENTAL WASTE CONTROL, INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 5 7 0 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 PRINCETON
P.O. BOX 431
INKSTER, MI. 48141

XII. TRANSPORTATION SERVICES USED

ENVIRONMENTAL WASTE CONTROL, INC. MID 0570002602

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	WASTE RUST PREVENTATIVE COMPOUND	02	D002	230000	P
2	WASTE PAINT AND TRICHLOETHYLENE	12	F001 D001	21780	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number--see instructions)

1. SPENT CORROSIVE FLUID AND SLUDGE FROM LUBRITE DIP TANKS

2. SPENT TRICHLOETHYLENE AND PAINT FROM CONVEYOR HOOK STRIPPER TANK

Page 3 of 3

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Explain your non-regulated status in the space below.

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

F M I D 0 0 8 6 7 4 4 8 0 2 (T A C) 1

This Facility's Non-Regulated Status is Expected to Apply:
☐ For 1983 Only ☐ Permanently
☐ Other (explain in comment section)

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

G M C CHEVROLET DETROIT GEAR AND AXLE

IV. FACILITY MAILING ADDRESS

3 1840 HOLBROOK AVE
Street or P.O. Box

4 DETROIT M I 4 8 2 1 2
City or Town State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

5
Street or Route number

6 State Zip Code
City or Town

VI. FACILITY CONTACT

2 D O N A L D J O H N S T O N
Name (last and first)

3 1 3 – 5 5 6 – 9 6 0 1
Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

$ 8 7 (2 zeros) A. Cost Estimate for Facility Closure

$ B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

for R. G. McGarry, Plant Manager — 1/23/84
Print/Type Name Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13B(5-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

FMI D 0 8 6 7 4 4 8 0 2 1 1

X. GENERATOR'S EPA I.D. NO.

GMI D 0 8 6 7 4 4 8 0 2

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE X

XII. GENERATOR ADDRESS

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE 1 2 8 6 6 UOM P

S02 AMOUNT OF WASTE UOM

S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM

S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
	1	WASTE PAINT AND WATER	D001	S01	208138	P
	2	WASTE PAINT AND FILTERS	D001	S01	34030	P
	3	WASTE PAINT AND WATER	D001	S01	48000	P
	4	WASTE PAINT	D001	S01	5445	P
	5	WASTE PAINT	D001	S01	25960	P
	6	WASTE CHLORINATED SOLVENTS	F002	S01	15420	P
	7	WASTE DIESEL FUEL	D001	S01	3168	P
	8	WASTE ROOFING COMPOUND	D001	S01	2350	P
	9	WASTE RUST PREVENTATIVE COMPOUND	D002	S05	2300000	P
	10	WASTE PAINT AND TRICHLOETHYLENE	F001 D001	S05	21780	P
	11					
	12					

Tear out here

XV. COMMENTS (enter information by section number—see instructions)

1. Ignitable Paint and Water from Spray Booth (mineral spirits base)
2. Ignitable Paint and Water from Spray Booth (water base)
3. Ignitable Paint and Water from Spray Booth (water base)
4. Ignitable Paint from Spray Booth (naptha base)
5. Ignitable Paint from Maintenance Operations (mineral spirits base)
6. Chlorinated Solvents from Decreasing Operations
7. Diesel Fuel from Contaminated Tank
8. Roofing Compound from Maintenance Roof Repairs
9. Spent Corrosive Fluid and Sludge from Lubrite Dip Tanks (not stored)
10. Spent Trichloethylene and Paint from Conveyor Hook Stripper Tank (not stored)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

TAC

FMID005356654 1

(1-2, 13-14-15)

C303 ENTRY (OFFICIAL USE ONLY) ☐

III. NAME OF INSTALLATION

GMC CHEVROLET FLINT MANUFACTURING (30-69)

IV. INSTALLATION MAILING ADDRESS

3300 N CHEVROLET AVE (15-16, 45)

Street or P.O. Box

FLINT MI 48555 (15-16, 41-42, 47-51)

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5 (15-16, 45)

Street or Route number

6 (15-16, 41-42, 47-51)

City or Town State Zip Code

VI. INSTALLATION CONTACT

2 ARDAHL NEAL (15-16, 45)

Name (last and first)

313-766-4914 (46-55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

M. G. Tate	Plant Manager	Marvin D. Tate	4/6/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Page 1 of 7

Tear out here

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 6 5 4 T/A C
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro-Chem Co.

X. FACILITY'S EPA I.D. NO.

F M I D 9 8 0 6 1 5 2 9 8
16 28

XI. FACILITY ADDRESS

1421 Lycaste St.
Detroit, MI 48214

XII. TRANSPORTATION SERVICES USED

Drury Brothers - MID056988892

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 17	1	Ignitable spent solvents from painting, degreasing, and sheet	0 8 31 34	D 0 0 1 U 2 3 9 35 36 37 38 39 42	2 9 5 0 0 51 59	G 60
	2	molding compound operations; mixture of xylene, acetone, MEK,		U 2 2 6 U 2 2 0 43 46 47 50		
	3	1,1,1,-trichlorethane, isopropyl alcohol, toluene, butyle cello-		U 1 6 1 U 0 3 1		
	4	solve, isobutyle acetate, MIBK butyl alcohol, ethyl alcohol,				
	5	naphtha, and heptane				
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Line 1: Density of waste is approximately 6.8 lbs/gal.

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 5 5 4 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal

X. FACILITY'S EPA I.D. NO.

F M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 N. Service Dr.
Belleville, Mi 48111

XII. TRANSPORTATION SERVICES USED

C.J. Rogers, Inc. - MIT270012347
J & W Leasing - MIT170019672

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Wastewater treatment sludge	1 5	F 0 0 6	3 6 4	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1	2											13	14	15
C	M	I	D	0	0	5	3	5	6	5	4		1	

X. FACILITY'S EPA I.D. NO.

16												28
F	M	I	D	0	0	7	2	4	8	3	1	

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Michigan Disposal

XI. FACILITY ADDRESS

49350 N. Service Dr.
Belleville. Mi 48111

XII. TRANSPORTATION SERVICES USED

C.J. Rogers, Inc. - MIT270012347
J & W Leasing - MIT170019672

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1	Wastewater treatment sludge	15	B006	8020	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 6 5 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Cecos International

X. FACILITY'S EPA I.D. NO.

F O H 0 0 0 0 6 1 6 6 2 9

XI. FACILITY ADDRESS

5092 Aber Rd.
Williamsburg, Oh 45176

XII. TRANSPORTATION SERVICES USED

Drury Brothers - MID056988892

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Ignitable solids resulting from sheet molding compound produc-	0 9	D 0 0 1	5 1 6 0 0	P
	2	tion; mixture of polyester resins, calcium carbonate, zinc				
	3	stearate, magnesium oxide polyvinyl acetate, styrene,				
	4	and magnesium hydroxide				
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 6 5 4 7/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Nelson Industrial Services, Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 8 0 1 1 9 9 2

XI. FACILITY ADDRESS

12345 Schaefer Hwy.
Detroit, Mi 48227

XII. TRANSPORTATION SERVICES USED

Nelson Industrial Services - MID098011992

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Chromic acid solution	0 2	D 0 0 2	7 0 0 0	G
	2	Chromic acid mixture, dry	0 2 1 6	D 0 0 2	6 3 0 0	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Line 1: Density of waste is approximately 8.9 lbs/gal

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 5 4 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

F

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1	Ignitable spent solvents from painting, degreasing, and sheet	0 8	D 0 0 1 U 2 3 9 U 1 5 9 U 0 0 4 2	3 4 0 0	G
		molding compound operations; mixture of xylene, acetone, MEK,		U 2 2 6 U 2 2 0 U 1 6 1 U 0 3 1		
		1,1,1-trichloroethane, isopropyl alcohol, toluene, butyl cellosolve, isobutyl acetate, MIBK, butyl alcohol, ethyl alcohol,				
		naphtha, and heptane				
2	2	Ignitable solids resulting from sheet molding compound production; mixture of polyester resins, calcium carbonate, zinc stearte,	0 9	D 0 0 1	5 9 5 0	P
		magnesium oxide, polyvinyl acetate, styrene, & magnesium hydroxide		U 0 8 0		
3	3	Methylene chloride used in sheet molding compound operation	1 3		2 9 6 0	G
4	4	Ignitable resins resulting from sheet molding compound operations mixture of polyester resins, styrene, magnesium hydroxide, magnesium oxide, and zinc stearate	0 8	D 0 0 1	2 0 0 0	P

XIV. COMMENTS (enter information by section number—see instructions)

Line 1: Density of waste is approximately 6.8 lbs/gal.
Line 3: Density of waste is approximately 11.1 lbs/gal.
All: 1983 generated - stored on-site less than 90 days as of December 31, 1983.

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

1 FOHD004200085 IT
1 2 13 14 15

II. NAME OF INSTALLATION

30 GENERAL MOTORS CORP., FISHER BODY DIV. 67

III. INSTALLATION MAILING ADDRESS

15 16 P.O. BOX 2567 45
Street or P.O. Box

15 16 MANSFIELD OH 44906
41 42 47 51
City or Town State Zip Code

IV. LOCATION OF INSTALLATION

15 16 2525 WEST FOURTH STREET 45 70
47 48
County Code

15 16 ONTARIO OH 44906 3465
41 42 47 51 53 56
City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

15 16 BOWMAN ALVIN 45 419-755-3351
46 55
Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year.)

NO HAZARDOUS WASTE WAS TRANSPORTED FROM THIS PLANT IN THE REPORTING YEAR OF 1983.

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R H Enright | Dir Mfg | [signature] | 2/2/84

Print/Type Name | Title | Signature of Authorized Representative | Date Signed

EPA 9019

42-590 O—85——33

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code. _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all entries on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C OHD004200085 12
1 2 13 14 15

IX. FACILITY'S EPA I.D. NO.

OHD004200085
16 27

X. FACILITY NAME

GENERAL MOTORS CORP., FISHER BODY
28 59

XI. FACILITY'S ADDRESS

P.O. BOX 2567
28
Street or P.O. Box

MANSFIELD OH 44906
28
City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1		28 29	30 31 32 33 34 35 36 37 38 39 40 41 42 43	46 47 48 49 50 51 52 53	54
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Do not make entries in shaded areas

O.M.B. No. 2050-0024 Expires 1-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

TAC

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
F	M	I	D	0	0	5	3	5	6	9	4	4		1

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

| 30 | | |

Entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Rec'd: _____ Rec'd by: _____

GENERATOR'S EPA I.D. NO.

I D 0 0 5 3 5 6 9 4 4 T A C T
13 14 15

FACILITY'S EPA I.D. NO.

I D 0 4 8 0 9 0 6 3 3
28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL

XI. FACILITY ADDRESS

49350 NORTH I-94 SERVICE ROAD

BELLEVILLE, MI 48111

TRANSPORTATION SERVICES USED

WOLVERINE DISPOSAL MID086148202

1060 RAWSONVILLE ROAD
YPSILANTI, MI 48197

WASTE IDENTIFICATION

No.	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
		13 14	35 38 39 42	43 51 52 59	60
1	PAINT SLUDGE SOLIDS N.O.S. (ORANGE PAINT)	1 5	D 0 0 7	2 6	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

COMMENTS (enter information by section number—see instructions)

Do not write within shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C
C M I D 0 0 5 3 5 6 9 4 4 1
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

INOKLAD CORP.

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 9 6 3 1 9 4
16 28

XI. FACILITY ADDRESS

24671 TELEGRAPH

SOUTHFIELD, MI 48034

XII. TRANSPORTATION SERVICES USED

STOCK BROS. CORP. GREAT LAKES INVIR. DIV. MID087478574
22077 MOUND DR.
WARREN, MI 48091

XIII. WASTE IDENTIFICATION

Sequence No.	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	IGNITABLE ZINC RICH PRIMER PAINT SLUDGE	0 8	D 0 0 1	2 5	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear right here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 9 4 4 T A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

PETRO-CHEM

X. FACILITY'S EPA I.D. NO.

F M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 LYCASTE
DETROIT, MI 48214

XII. TRANSPORTATION SERVICES USED

DRURY BROS. MID056988892
11950 E. NEWBURG ROAD
DURAND, MI 48429

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Class.	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	IGNITABLE SPENT SOLVENT	0 8	D 0 0 1	2 4	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

Tear out here

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

T/A C
M I D 0 4 1 5 1 2 2 5 2
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

III. NAME OF INSTALLATION

G M C F I S H E R B O D Y T E C U M S E H
30 49

IV. INSTALLATION MAILING ADDRESS

5 5 5 0 0 C C I D E N T A L H W Y
15 16 45

Street or P.O. Box

T E C U M S E H M T 4 9 2 8 6
15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 45

Street or Route number

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

W I L C O X T O M
15 16 43

Name (last and first)

5 1 7 — 4 2 3 — 0 2 2 8
46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

W. H. Siegmund Plant Manager W. H. Siegmund 2 1 84

Print/Type Name Title Signature of Authorized Representative Date Signed

Page 1 of 6

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.
M I D 0 4 1 5 1 1 2 1 2 1 5 1 2 (T/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
PETRO-CHEM PROCESSING, INC.

X. FACILITY'S EPA I.D. NO.
M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS
421 Lycaste
Detroit, Mich 48214

XII. TRANSPORTATION SERVICES USED
ERNIE WASTE HAULING
1980 Lexington Parkway
Inkster, Michigan 48141 MID 052447935

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Paint Sludge and Residues	0 8	F 0 0 3	2 4 6 4	P
2	Chloroprene Adhesive Sludge	0 8	F 0 0 3	1 9 4 7	P
3					
4					
5					
6	—				
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Page ____ of ____

Tear out here

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-84

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

MIDO053569281 (1-12, 13 T, A, L, 14, 15)

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

FISHER BODY DIV. GMC LANSING PLANT (30-64)

IV. INSTALLATION MAILING ADDRESS

3401 VERLINDEN AVE (15-16, 45)

Street or P.O. Box

LANSING (15-16) MI (41-42) 48901 (47-51)

City or Town — State — Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(15-16, 45)

Street or Route number

(15-16, 41-42, 47-51)

City or Town — State — Zip Code

VI. INSTALLATION CONTACT

ZOTTO KENNETH (15-16, 45)

Name (last and first)

517-377-4500 (46-55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

L. R. BOERMA — PLANT ENGINEER — [signature] — 2-10-84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Page 1 of ____

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 9 2 8 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 0 0 7 2 4 8 3 1

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE
BELLEVILLE, MI.48111

XII. TRANSPORTATION SERVICES USED

GREAT LAKES ENVIRONMENTAL SERVICES DIV.
22077 MOUND ROAD
WARREN, MI. 48901 MID 087478574

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	WASTE PLANT FILTER CAKE	1 5	F 0 0 5	1 2	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Page 1 of 1

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 9 2 8 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE
BELLEVILLE, MI. 48111

XII. TRANSPORTATION SERVICES USED

GREAT LAKES ENVIRONMENTAL SERVICES DIV.
22077 MOUND RD.
WARREN, MI. 48091 MID 087478574

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	WASTE PLANT FILTER CAKE	1.5	F006	0382	T
	2	BONDERITE TANK BOTTOMS	1.5	D008	58	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Page ___ of ___

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 9 2 8 (T/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A-1 DISPOSAL CORP.

X. FACILITY'S EPA I.D. NO.

M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 BROAD ST.
PLAINWELL, MI. 49080

XII. TRANSPORTATION SERVICES USED

A-1 DISPOSAL CORP
400 BROAD ST.
PLAINWELL, MI. 49080

MID 059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	MIXED SOLVENTS FROM PAINT SHOP CLEAN UP OPERATIONS ON THE BODY	0 8	D 0 0 1	1 2 3	T
	2	MIXED ANTI RUST AND DEADENER FROM EQUIPMENT & CONTAINER CLEAN UP	0 8	D 0 0 1	1 3 5 0 0	P
	3	MIXED PAINT & CHLORINATED SOLVENT FROM CLEANING GUNS&EQUIP	0 8	D 0 0 1 / D 0 0 5 / D 0 0 7	1 2	T
	4	MIXED PAINT & CHLORINATED SOLVENT FROM CLEANING GUNS & EQUIP	0 8	D 0 0 1	1 3	T
	5	SOLVENT USED FOR CLEANING EQUIP	0 8	D 0 0 1	6	T
	6	SOLVENT USED FOR CLEANING HEAT EXCHANGERS	0 8	D 0 0 1 / D 0 0 7	1 5	T
	7	OFF STANDARD PRIMER	0 8	D 0 0 1	1 5 6	P
	8	USED MOTOR OIL	1 5	D 0 0 7 / D 0 0 8	8 8 1 3	P
	9	SOLVENT USED TO CLEAN REPAIR PAINT LINES	0 8	D 0 0 5 / D 0 0 1	2 5 2 4	P
	10	OFF STANDARD PAINT	0 8	D 0 0 1 / D 0 0 7 / D 0 0 8	1 7 9 9	P
	11	SOLVENT USED FOR CLEANING ANTI RUST SPRAY EQUIPMENT	0 8	D 0 0 1	1 1 0 2	P
	12	SOLVENT USED FOR CLEANING PAINT MIX ROOM EQUIPMENT	0 8	D 0 0 1	1 2 2 6	P

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 1 5 1 6 9 1 2 8 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A-1 DISPOSAL

X. FACILITY'S EPA I.D. NO.

M I D 0 1 5 1 6 9 1 5 1 2

XI. FACILITY ADDRESS

400 BROAD ST
PLAINWELL, MI. 49080

XII. TRANSPORTATION SERVICES USED

A-1 DISPOSAL - CONTINUED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	SOLVENT & PAINT RESIDUES FROM EQUIP CLEANING	0,8	D,0,0,1	7,8,9,5	P
	2	CHLORINATED SOLVENT FROM CLEANING EQUIPMENT	0,8	D,0,0,1	5,9,7	P
	3	OFF STD. PRIMER	0,8	D,0,0,1	2,2,0,3	P
	4	SOLVENT FROM MISC. PLANT CLEANING	0,8	D,0,0,1	4,1,3	P
	5	SOLVENT & SEALER RESIDUES FROM EQUIPMENT CLEANING	0,8	D,0,0,1 D,0,0,5 D,0,0,6 D,0,0,9	5,0,5	P
	6	MIXED SOLVENTS FROM EQUIPMENT CLEANING	0,8	D,0,0,1 D,0,0,6 D,0,0,8	4,1,3	P
	7	SPENT HALOGENATED SOLVENTS	0,8	F,0,0,2	3,5,8,0	P
	8	USED CHLORINATED SOLVENTS FROM CLEANING OPERATIONS	1,5	D,0,0,5 D,0,0,7 D,0,0,8	5,3,7,0	P
	9	SPENT SOLVENT FROM EQUIPMENT CLEANING	0,8	D,0,0,1	2,4,7,9	P
	10	USED CHLORINATED SOLVENT FROM CLEANING EQUIPMENT	1,5	D,0,0,6 D,0,0,8	5,0,5	P
	11	CONTAMINATED THINNER	0,8	D,0,0,1 D,0,0,8	2,2,0,3	P
	12	USED OIL & WATER	0,8	D,0,0,1	1,0,1,0	P

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

MI1D0053516912 8 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A-1 DISPOSAL

X. FACILITY'S EPA I.D. NO.

MID059614512

XI. FACILITY ADDRESS

400 BROAD ST
PLAINWELL, MI. 49080

XII. TRANSPORTATION SERVICES USED

A 1 DISPOSAL - CONTINUED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	DEADNER & SOLVENT FROM EQUIPMENT CLEANING	0,8	D001 D002	1660	P
	2	USED MINERAL OIL	0,8	D001	1928	P
	3	ANTI RUST & CHLORINATED SOLVENT FROM EQUIPMENT CLEANING	0,8	D001	734	P
	4	SPENT THINNER FROM EQUIPMENT CLEANING	0,8	D001	1088	P
	5	SPENT CHLORINATED SOLVENTS	0 8	D001	1790	P
	6	PURGE THINNER CONTAMINATED W/WATER	0 8	D001	780	P
	7	MIXED SOLVENT FROM EQUIPMENT CLEANING	0,8	D001	321	P
	8	SPENT FABRIC CLEANER	0 8	D001	2876	P
	9	OFF STANDARD DEADENER	0,8	D001	1749	P
	10	ANTI RUST & MINERAL SPIRITS FROM EQUIP CLEANING	0,8	D001	767	P
	11	OFF STANDARD PAINT	0,8	D001	422	P
	12	SPENT CHLORINATED SOLVENT & OIL FROM EQUIP CLEANING	0,8	D017 D001	1010	P

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 9 2 8 (T/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A-1 DISPOSAL

X. FACILITY'S EPA I.D. NO.

M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 BROAD ST
PLAINWELL, MI. 49080

XII. TRANSPORTATION SERVICES USED

A-1 DISPOSAL - CONTINUED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	SPENT SOLVENT FROM LINE CLEANING	0 8	D 0 0 1	1 0 8 8	P
	2	MIXED PAINTS & SOLVENTS FROM CLEANING EQUIPMENT	0 8	D 0 0 1 / D 0 0 7 / D 0 0 8	4 1 3	P
	3	SPENT CHLORINATED SOLVENTS & ADHESIVES FROM EQUIPMENT CLEANING	0 8	D 0 0 1 / D 0 0 5	5 9 7	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd. _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 1 0 1 5 1 3 5 1 6 1 9 1 2 1 8 (T/A C) M I

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I D 0 1 9 1 6 1 9 1 6 1 3 1 3 1 9 1 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI. 48192

XII. TRANSPORTATION SERVICES USED

PAUL O. SELLARS CO. MID 980793350
18550 ALLEN RD
WYANDOTTE, MI. 48192

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	USED MOTOR OIL	1, 5	D 0 0 3 / D 0 0 7 / D 0 0 1 8	1 4 7 9 6	P
	2	OFF STANDARD SEALER	1, 5	U 0 1 1 3	3 0 2 9	P
	3	OFF STANDARD PRIMER - AIR DRIED	0, 8	D 0 0 1 4	1 9 8	P
	4	OFF STANDARD SEALER - AIR DRIED	0, 8	D 0 0 1 1 / D 0 0 1 2 / U 2 2 0 / U 1 5 9	4 3 6	P
	5	OFF STANDARD SEALER	1, 5	D 0 0 1 8 / U 0 3 9	7 0 7	P
	6	AIR DRIED DEADENER AND SOAK UP	0, 8	D 0 0 1 4	5 7 8	P
	7	AIR DRIED PAINT - OFF STANDARD	0, 8	D 0 0 1 4	2 5 7 0	P
	8	OFF STANDARD WATER BASED PRIMER	1, 5	D 0 0 1 8	5 5 1	P
	9	CONTAMINATED SOLVENTS	0 8	D 0 0 1 4	1 0 3 0	P
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Page ____ of ____

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 9 2 8 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN RD.
WYANDOTTE, MI. 48192

XII. TRANSPORTATION SERVICES USED

CHEM MET SERVICES
18550 ALLEN RD.
WYANDOTTE, MI. 48192

MID 096963194

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	OFF STANDARD (AIR DRIED) TEXTURE PAINT	0 8	D 0 0 1	1 1 1 0 8	P
	2	OFF STANDARD (AIR DRIED) GLASS PRIMER	0 8	D 0 0 1	3 0 9 2	P
	3	OFF STANDARD (AIR DRIED) SEALER	0 8	D 0 0 1	1 4 9	P
	4	USED HYDRAULIC OIL	1 5	D 0 0 5 D 0 0 7	3 9 4 7	P
	5	ANTI RUST CONTAMINATED WITH SOAK UP	0 8	D 0 0 1	3 7 5	P
	6	OFF STANDARD (AIR DRIED) PRIMER PAINT	0 8	D 0 0 1	4 5 9	P
	7	OFF STANDARD (AIR DRIED) ADHESIVE	0 8	D 0 0 1 U 0 8 0	1 2 3 9	P
	8	OFF STANDARD (AIR DRIED) DEADENER	0 8	D 0 0 1	1 1 6 6	P
	9	OFF STANDARD (AIR DRIED) ADHESIVE	1 5	D 0 0 8	7 0 7	P
	10	OFF STANDARD (AIR DRIED) SEALER	D 0 0 1 1 5 U 2 2 0	U 0 0 2 U 1 5 9	8 2 6	P
	11	SPENT SOLVENT AND OIL	1 5	D 0 0 5	5 0 5	P
	12	OFF STANDARD (AIR DRIED) ADHESIVE	0 8	D 0 0 1	2 8 6 7	P

XIV. COMMENTS (enter information by section number—see instructions)

Page 1 of 2

tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

M I D 0 0 5 3 5 6 5 2 8 I T

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I D 0 9 8 9 8 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN RD
WYANDOTTE, MI. 48192

XII. TRANSPORTATION SERVICES USED

CHEM MET SERVICES - CONTINUED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. (DOT) Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	OFF STANDARD WATER BASED PRIMER	1 n	D 0 0 8	3 3 0 8 4	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number - see instructions)

Tear seal here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I I D 1 0 1 0 1 5 1 3 1 5 1 6 1 9 1 2 1 8 T/A C 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM MET SERVICES

X. FACILITY'S EPA I.D. NO.

F M I I D 1 0 1 9 1 6 1 9 1 6 1 3 1 5 1 5 1 4

XI. FACILITY ADDRESS

18550 ALLEN RD
WYANDOTTE, MI. 48192

XII. TRANSPORTATION SERVICES USED

GREAT LAKES ENVIRONMENTAL SERVICES DIV.
22077 MOUND RD.
WARREN, MI. 48091

MID 087478574

XIII. WASTE IDENTIFICATION

Sequence of Line No.	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	WASTE PLANT FILTER CAKE	1 5	D 0 0 7	5 6 2	T
2	KILLED PAINT SLUDGE	1 5	D 0 0 8	1 6 2 7 3	P
3	LIQUID FROM FILTER CAKE LOAD	1 5	F 0 0 6	1 3 7 7 0	P
4	BONDERITE TANK BOTTOMS	1 5	D 0 0 8	2 8 9	T
5	ELPO FILTER BAGS	1 5	D 0 0 8	6 2 0 0	P
6	KILLED PAINT TANK BOTTOMS	1 5	D 0 0 8	5 1	T
7	BONDERITE SLUDGE	1 5	D 0 0 8	4 6 7 3	P
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number - see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A/C

G M I D 0 0 5 3 5 6 9 2 8 1 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

F

16 28

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	CHLORINATED SOLVENT 1844	0 8 (33 34)	D 0 0 1 (35 38)	1 7 9 0 1 (51 59)	P (60)
	2	MIXED WASTE/ANTI FREEZE USED OIL 2934	1 5	D 0 0 5 D 0 0 7 (43 46 47 50) D 0 0 6 D 0 0 8	5 5 1	P
	3	EP 69004 OIL		D 0 0 7	5 5 1	P
	4	CP 69008 & WATER	1 5	D 0 0 7 D 0 0 8	5 9 7	P
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

1983 GENERATED - STORED ON SITE LESS THAN 90 DAYS AS OF DECEMBER 31, 1983.

Tear out here

Ar

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-Handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
6 Closed

This Installation's Non-Regulated Status is Reported as Active:

☐ Pre-1980 Data ☐ Processing

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

MID 076 133 127 1 — Box C

III. NAME OF INSTALLATION

GMC PONTIAC BODY DIVISION

IV. INSTALLATION MAILING ADDRESS

1200 NORTH PERRY STREET

Street or P.O. Box

PONTIAC MI 48340

City or Town — State — Zip Code

V. LOCATION OF INSTALLATION (If different than section IV above)

Street or Route number

City or Town — State — Zip Code

VI. INSTALLATION CONTACT

SIEBAKER, E. E. SA

Name (last and first)

313 853-8127

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

M. C. Gabalski Maintenance Superintendent M. C. Gabalski 3/30/84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 1 7 6 1 3 1 1 2 7 8 TA C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI 48192

XII. TRANSPORTATION SERVICES USED

CHEM-MET SERVICES
18550 ALLEN ROAD
WYANDOTTE, MI 48192

XIII. WASTE IDENTIFICATION

No.	A. Description of Waste	B. EPA/State Waste Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	SOLVENTS, NOS	0,7	D,0,0,1	4,1,2,5	Gals.
2	COMPOUND PAINT THINNER	0,7	F,0,0,3	3,3,0	Gals.
3	AMMONIUM HYDROXIDE	0,2	D,0,0,2	4,4,0	Gals.
4	WASTE HYDROCHLORIC ACID	0,2	D,0,0,2	1,6,5	Gals.
5	ANTIFREEZE COMPOUD, LIQUID	0,1	D,0,0,1	1,7,6,0	Gals.
6	OIL PETROLEUM, NOS	0,1	D,0,0,1	2,0,9,0	Gals.
7	HAZARDOUS WASTE SOLID	1,2	D,0,0,1	4,4,0	Gals.
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

Tear out here

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Type or print (use elite type)

II. GENERATOR'S EPA I.D. NUMBER

(1) (2) (3) M I D 0 0 5 3 5 6 7 9 5 (14) (15)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

EPA ENTRY (OFFICIAL USE ONLY)

III. NAME OF INSTALLATION

(16) G E N E R A L M O T O R S C O R P O R A T I O N G M A D W R

IV. INSTALLATION MAILING ADDRESS

(17) 3 2 6 2 5 T Y L E R

Street or P.O. Box

(18) Y P S I L A N T I | M I | 4 8 | 1 9 7

City or Town | State | Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(19) S A M E A S A B O V E

Street or Route number

(20)

City or Town | State | Zip Code

VI. INSTALLATION CONTACT

(21) R A N D A L L M I C H A E L F

Name (last and first)

(22) 3 1 3 4 8 5 6 2 0 0

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Frank D. Faga — Plant Manager — 2/17/84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13A/B (Revised 11-83)

Page 1 of 1

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 7 9 5 8 11

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEMICAL RECOVERY

X. FACILITY'S EPA I.D. NO.

E M I D 0 6 0 9 7 5 8 4 4

XI. FACILITY ADDRESS

36345 VAN BORN
ROMULUS, MICH. 48174

XII. TRANSPORTATION SERVICES USED

CHEMICAL RECOVERY - MID060975844

XIII. WASTE IDENTIFICATION

Sequence #					
1	Mixed Thinning Compounds and Chlorinated Solvents	0 8		2 5 0 0 0	G
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by action number—see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 7 9 5 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

DEARBORN REFINING CO.

X. FACILITY'S EPA I.D. NO.

M I D 0 0 5 5 1 0 8 0 5

XI. FACILITY ADDRESS

3901 WYOMING
DEARBORN, MICHIGAN

XII. TRANSPORTATION SERVICES USED

ABC OIL - MID000725069

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Oil Mich.Act 136 Waste	1	5	4,000	G
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: Rec'd by

VIII. GENERATOR'S EPA I.D. NO.

M I 1 D 1 0 1 0 1 5 1 3 1 5 1 6 1 7 1 9 1 5 T/A C 2 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

RECOVERY SPECIALIST INC

X. FACILITY'S EPA I.D. NO.

M I 1 D 1 0 1 0 1 7 1 2 1 2 1 6 1 5 1 2

XI. FACILITY ADDRESS

BOX 255
SALINE, MICHIGAN 48176

XII. TRANSPORTATION SERVICES USED

RECOVERY SPECIALIST - MIDD00722652

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. Total Quantity of Waste	C. EPA Hazardous Waste No.	D. Amount of Waste	E. Unit of Measure
1	Polychlorinated Biphenyl Mich. ACT 136 waste				
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 7 9 5 (N/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL

X. FACILITY'S EPA I.D. NO.

M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 N. SERVICE DR.
BELLEVILLE, MICHIGAN 48111

XII. TRANSPORTATION SERVICES USED

WASTE MANAGEMENT OF MICHIGAN - MID072790546

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Hazardous Waste Solid NOS (PAINT SLUDGE)			540	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

M Reed 2/21/84

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 7 9 5 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

PETRO CHEM PROCESSING

X. FACILITY'S EPA I.D. NO.

M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 LYCASTE
DETROIT, MICHIGAN 48212

XII. TRANSPORTATION SERVICES USED

STOCK BROTHERS - MID 017378142
K & D INDUSTRIAL SERVICES - MID072790710

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
32	1	Mixed Thinning Compounds and Chlorinated Solvents	0 7		3 9 0 0 0	G
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

VIII. GENERATOR'S EPA I.D. NO.

M I 0 0 5 3 5 6 7 9 5

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I 0 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN RD.
WYANDOTTE, MICHIGAN 48192

XII. TRANSPORTATION SERVICES USED

CHEM MET SERVICES - MID09693194
PAUL O. SELLERS - MID980793350

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	waste Cements and Adhesives NOS	0 8	D 0 0 1	3 7 0	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Page ___ of ___

Please print or type in ELITE type (12 characters per inch).

Form Approved OMB No. 2000-0058
GSA No. 0271-EPA-AR

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE REPORT

PLEASE PLACE LABEL IN THIS SPACE

I. TYPE OF HAZARDOUS WASTE REPORT

PART A: GENERATOR ANNUAL REPORT
THIS REPORT IS FOR THE YEAR ENDING DEC. 31: 1983

PART B: FACILITY ANNUAL REPORT
THIS REPORT FOR YEAR ENDING DEC. 31: 1983

PART C: UNMANIFESTED WASTE REPORT
THIS REPORT IS FOR A WASTE RECEIVED (day, mo., & yr.): - - -19

INSTRUCTIONS: You may have received a preprinted label attached to the front of this pamphlet; affix it in the designated space above—left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing this form. The information requested herein is required by law (Section 3002/3004 of the Resource Conservation and Recovery Act).

II. INSTALLATION'S EPA I.D. NUMBER
F DED025692905

III. NAME OF INSTALLATION
GMC GM ASSEMBLY DIVISION WILM DE

IV. INSTALLATION MAILING ADDRESS
3 STREET OR P.O. BOX: PO BOX 1512
4 CITY OR TOWN: WILMINGTON ST.: DE ZIP CODE: 19899

V. LOCATION OF INSTALLATION
5 STREET OR ROUTE NUMBER: BOXWOOD ROAD
6 CITY OR TOWN: WILMINGTON ST.: DE ZIP CODE: 19899

VI. INSTALLATION CONTACT
2 NAME (last and first): ANDERSON ROBERT PLANT ENGINEER
PHONE NO. (area code & no.): 302-998-8831

VII. TRANSPORTATION SERVICES USED (for Part A reports only)
List the EPA Identification Numbers for those transporters whose services were used during the reporting year represented by this report.

NJD 067387514
NJD 030306732

VIII. COST ESTIMATES FOR FACILITIES (for Part B reports only)

A. COST ESTIMATE FOR FACILITY CLOSURE
G $ 157,141

B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE (disposal facilities only)
$

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

ROBERT E. ANDERSON — A. PRINT OR TYPE NAME
Robert E Anderson — B. SIGNATURE
JAN 27, 1984 — C. DATE SIGNED

Please print or type with ELITE type (12 characters/inch)

Form Approved OMB No. 2000-0058
GSA No. 12345-XX

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA FACILITY REPORT – PARTS B & C

(Collected under the authority of Section 3004 of RCRA)

FOR OFFICIAL USE ONLY (Items 1 & 2)	1. DATE RECEIVED	XVI. TYPE OF REPORT (enter an "X")	XVII. FACILITY'S EPA I.D. NO.
	2. RECEIVED BY	☒ PART B ☐ PART C	GDD023692905

XVIII. GENERATOR'S EPA I.D. NO.

XX. GENERATOR ADDRESS (street or P.O. box, city, state, & zip code)

XIX. GENERATOR NAME (specify)

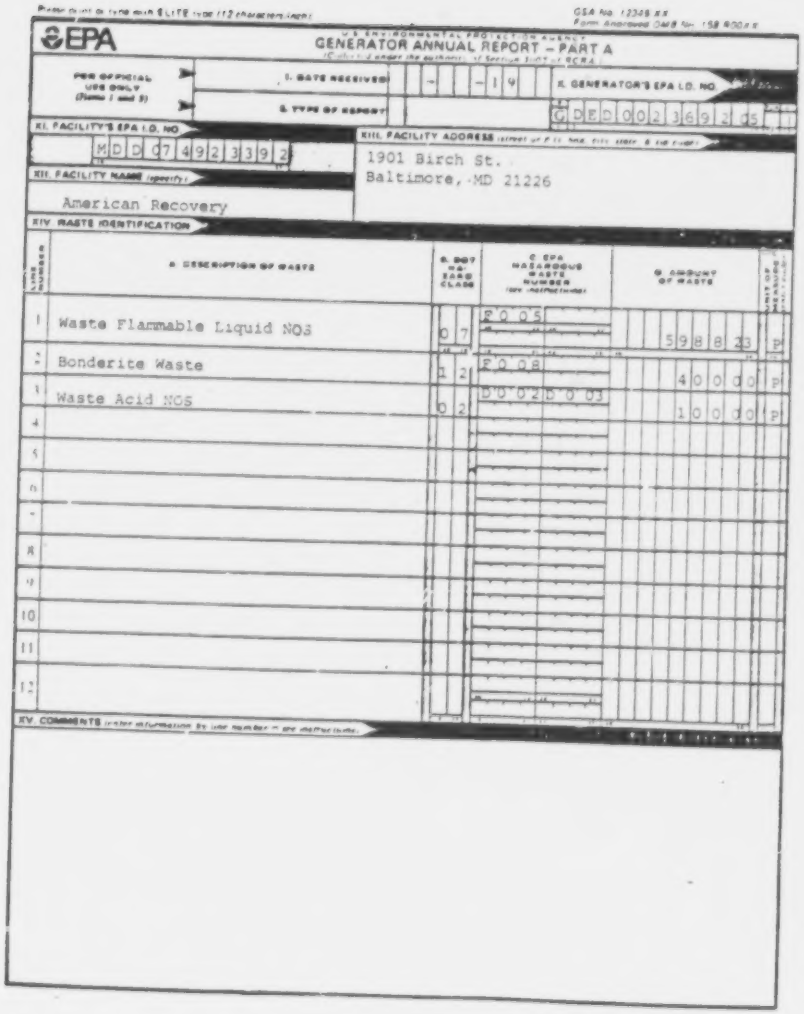
ON - SITE

XXI. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. EPA HAZARDOUS WASTE NUMBER (see instructions)	C. HANDLING METHOD (enter code)	D. AMOUNT OF WASTE	UNIT OF MEASURE (enter code)
1	WASTE SOLVENTS	F005		395756	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XXII. COMMENTS (enter information by line number – see instructions)

XXI, ITEM C: NO HANDLING CODE NOTED ABOVE. THESE WASTE SOLVENTS (395,756 LBS) WERE GENERATED AT THIS FACILITY AND BURNED AS AN ALTERNATE FUEL IN THE POWERHOUSE BOILER FOR HEAT RECOVERY.



EPA

GENERATOR ANNUAL REPORT – PART A

FOR OFFICIAL USE ONLY (Items 1 and 2)

1. DATE RECEIVED: - -19

2. TYPE OF REPORT

X. GENERATOR'S EPA I.D. NO.: C B E D 0 0 2 3 6 9 2 5

XI. FACILITY'S EPA I.D. NO.: M D D 0 7 4 9 2 3 3 9 2

XII. FACILITY NAME (specify): American Recovery

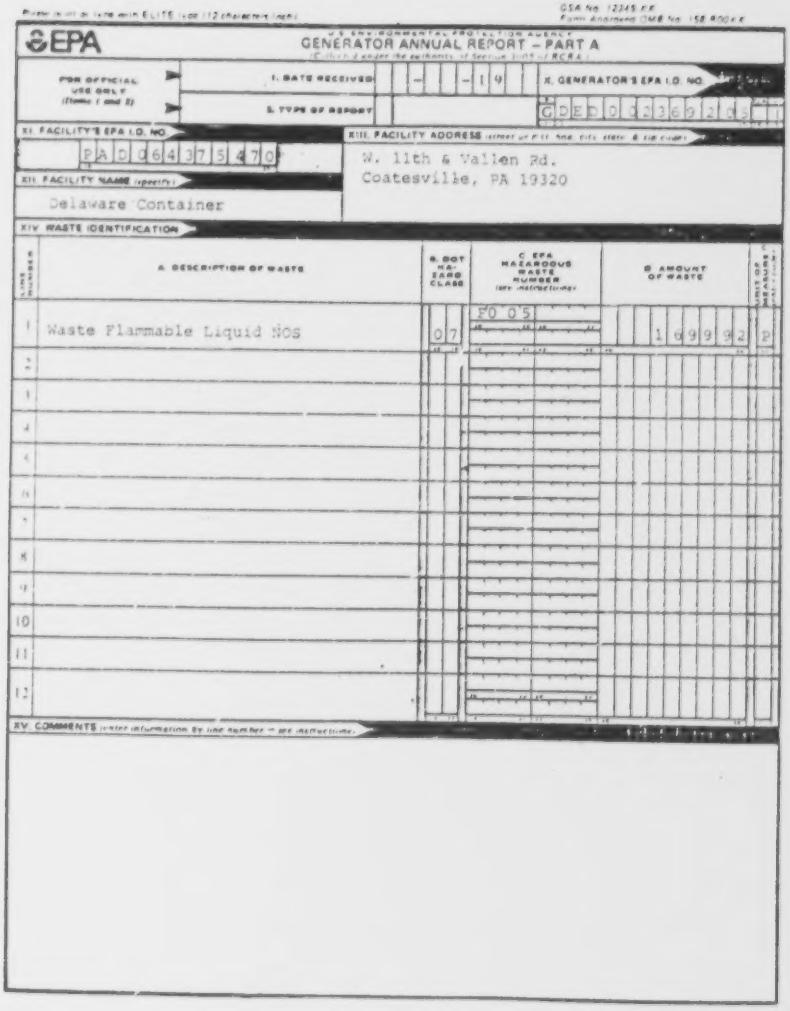
XIII. FACILITY ADDRESS: 1901 Birch St. Baltimore, MD 21226

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER	D. AMOUNT OF WASTE	UNIT OF MEASURE
1	Waste Flammable Liquid NOS	0 7	F 0 0 5	5 9 8 8 33	P
2	Bonderite Waste	1 2	F 0 0 8	4 0 0 0 0	P
3	Waste Acid NOS	0 2	D 0 0 2 B 0 0 3	1 0 0 0 0	P
4					
5					
6					
7					
8					
9					
10					
11					
12					

XV. COMMENTS

Doc. No. 40-08/81/12/5



EPA

GENERATOR ANNUAL REPORT – PART A

FOR OFFICIAL USE ONLY (Items 1 and 2)

1. DATE RECEIVED: - - 19

2. TYPE OF REPORT

X. GENERATOR'S EPA I.D. NO.: GDED022365

XI. FACILITY'S EPA I.D. NO.: PAD064375470

XIII. FACILITY ADDRESS: W. 11th & Vallen Rd. Coatesville, PA 19320

XII. FACILITY NAME: Delaware Container

XIV. WASTE IDENTIFICATION

LINE NO.	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER	D. AMOUNT OF WASTE	D. UNITS OF MEASURE
1	Waste Flammable Liquid NOS	07	F005	1999.2	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XV. COMMENTS

Doc. No. 40-08/81/12/5

Do not make marks in shaded areas

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

GENERATOR ANNUAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-Handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with one letter (or character) per box.

II. GENERATOR'S EPA I.D. NUMBER

K S D 0 0 0 7 3 1 5 8 9

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

CBIS ENTRY (OFFICIAL USE ONLY) ☐

III. NAME OF INSTALLATION

G M C - O I N A D [redacted]

IV. INSTALLATION MAILING ADDRESS

[redacted]
Street or P.O. Box

[redacted]
City or Town — State — Zip Code

V. LOCATION OF INSTALLATION (If different than section IV above)

S A M E
Street or Route number

City or Town — State — Zip Code

VI. INSTALLATION CONTACT

[redacted]
Name (last and first)

9 1 3 - 2 8 1 - 6 3 3 7
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. R. Williams — Plant Engineer

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-12A (6-80) (Revised 1-83)

Page 1 of 3

Do not make entries in shaded areas

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Generator ANNUAL Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

I N D 0 7 1 1 5 8 9 9 1 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

TWLD, Inc.

X. FACILITY'S EPA I.D. NO.

I N D 0 9 3 2 1 9 0 1 2

XI. FACILITY ADDRESS

7901 West Morris Street
Indianapolis, Indiana 46231

XII. TRANSPORTATION SERVICES USED

ILT, Inc., IND058484114

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. EPA/State Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	EP Toxic for total Chromium only generated from chromium ~~removal system on electro-~~ plating operations. Chromium sludge is about 3% chromium hydroxide and 95% free water	1,5	D 0 0 4	2 8 6	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by sequence number - see instructions)

Page 2 of 3

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Generator ANNUAL Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

K S D 0 1 0 1 7 1 4 5 8 9

IX. FACILITY NAME (Identify facility to which all entries on this page were shipped)

(DISPCI)
Lone Mountain Surface Disposal Site

X. FACILITY'S EPA I.D. NO.

O K D 0 1 6 5 4 3 8 3 7 6

XI. FACILITY ADDRESS

RR #2, Box 180A
Waynoka, Oklahoma 73860

XII. TRANSPORTATION SERVICES USED

U. S. Pollution Control, Inc., ORT 410010474

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Units of Measure
1	Kolene salt sludge generated from paint stripping process. This sludge is classified hazardous because of EP Toxicity (Chromium)	0,2	D 0 0 7	6,3	T
		1,5			
2	Liquid waste paint and non-halogenated cleaning solvents from painting and cleaning operations. Material is ignitable	3 8	D 0 0 1	3 0 0	T
3	Waste sealers and adhesives used in Hard & Soft Trim assembly. Generated as residue or obsolete virgin material. This waste is hazardous due to EP toxicity for lead	0 8	D 0 0 8	6 0	T

XIV. COMMENTS (enter information in section number—see instructions)

Page 3 of 3

Do not make entries in shaded areas

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

FACILITY ANNUAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Explain your non-regulated status in the space below.

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

KSC
F|S|D|0|0|7|4|5|8|9|9|1|
1 2 13 14 15

This Facility's Non-Regulated Status is Expected to Apply:
☐ For 1983 Only ☐ Permanently
☐ Other (explain in completed section)

CRD ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

C|M|C - G|M|A|D| |F|A|I|R|F|A|X| |P|L|A|N|T|
30 42

IV. FACILITY MAILING ADDRESS

1|1|0|0| |E| |3|0|T|H| |A|V|E|N|U|E| |E|A|S|T|
15 16 42

Street or P.O. Box

A|T|W|O|O|D| |K|A|N|S|A|S|
15 16 41 42 51

City or Town State Zip Code

V. LOCATION OF FACILITY (If different than section IV above)

S|T|A|T|E| |L|I|N|E|
15 16 45

Street or Route number

15 16 41 42 51

City or Town State Zip Code

VI. FACILITY CONTACT

J|O|H|N| |E|A|M|E|S| |M|O|R|R|E|T|
15 16 46

Name (last and first)

9|3|-|2|8|1|-|6|3|3|7|
26 30

Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

$ |4|6|2|9|9|
16 19 22

A. Cost Estimate for Facility Closure

$ |0|
25 31

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. R. Williams, Plant Engineer

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A/S-001 (Revised 11-83)

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Facility ANNUAL Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

IX. FACILITY'S EPA I.D. NO.

KSD 010 717 459

X. GENERATOR'S EPA I.D. NO.

KSD 010 717 459

XI. GENERATOR NAME (Identify generator from whom all wastes on this page were received)

CHC - CHAD Fairfax

XII. GENERATOR ADDRESS

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 ____ AMOUNT OF WASTE ____ UOM

S02 ____ AMOUNT OF WASTE ____ UOM

S03 ____ AMOUNT OF WASTE ____ UOM

S04 ____ AMOUNT OF WASTE ____ UOM

S05 ____ AMOUNT OF WASTE ____ UOM

XIV. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
1	Waste cleaning solvents and liquid paint. Material is ignitable.	D001	S01	549	T
2	Kolene salt sludge from paint removal process. EP toxicity for chromium	D007	S01	63	T
3	Waste sealers and adhesives generated as residue or obsolete virgin material. Hazardous material due to EP toxicity for lead.	D008	S01	60	T
4	Chromium sludge, 5% chromium hydroxide, generated from chromium removal system on electroplating operations. EP toxic for total chromium.	D007	S01	345	T
10					
11					
12					

XV. COMMENTS (enter information by section number--see instructions)

449 tons of waste solvents recycled in calendar year 1983.

Page 2 of 3

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field, Topeka, Kansas 66620 913-862-9360
Division of Environment

HAZARDOUS WASTE GENERATOR'S MONITORING FEE

Kansas Regulation 28-31-10(e), effective January 13, 1984, requires all hazardous waste generators to pay an annual monitoring fee beginning with calendar year 1983.

The fee applies to any person who has generated more than one hundred (100) kilograms of hazardous waste or 1 kilogram of acute hazardous waste in any one month during the reporting year. Generators who have accumulated more than 1000 kilograms at any time during the year would also be subject to this fee. Each hazardous waste generator shall pay an annual monitoring fee of $200.00 plus $5.00 per ton, or any portion thereof, for all hazardous waste generated during the previous calendar year. The $5.00 per ton fee shall not apply to those hazardous wastes which are processed to recover substantial amounts of either energy or materials and which are exempted from regulation by 40 CFR 261.6(a), as in effect on September 1, 1983. The maximum total fee shall be $5,000.00.

Please return this form with a check made payable to: Kansas Department of Health and Environment, before March 1, 1984.

1983 GENERATOR MONITORING FEE

EPA I.D. No. KSD007145899

Company Name GMC - GMAD Fairfax

Location 100 Kindelberger Road County Wyandotte

City Kansas City State KS Zip Code 66115

Total amount of hazardous waste generated in 1983 in tons 568

FEE CALCULATION

Base Fee		$ 200.00
Total Amount in tons (568) x $5 per ton =		$2,840.00
Total Fee		$3,040.00

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

F O H D 9 8 0 5 6 9 3 8 8 1 9

1 2 13 14 15

II. NAME OF INSTALLATION

MORAINE ENGINE PLANT, DDA DIV GMC

30 67

III. INSTALLATION MAILING ADDRESS

3 4100 SPRINGBORO RD

15 16 45

Street or P.O. Box

4 PO BOX 12911 DAYTON OH 45401

15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

3 4100 SPRINGBORO RD 43

15 16 45 47 48

County Code

6 MORAINE OH 45439 3519

15 16 41 42 47 51 53 56

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

2 FESTA VINCENT 513-297-2229

15 16 45 46 55

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED

(list the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year)

SOLVENT RESOURCE RECOVERY OHD093945293

LESTER SEWER CORPORATION OHD072864390

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

VINCENT FESTA ENVIRONMENTAL ENGR [signature] 4/27/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA 8015

OHIO ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the Calendar year ending December 31, 19 83

FACILITY INFORMATION

Specify facility to which all wastes on this page were sent

VIII. GENERATOR'S EPA I.D. NO.

C OHD980569388

IX. FACILITY'S EPA I.D. NO.

OHD087433744

X. FACILITY NAME

CECOS INTERNATIONAL

XI. FACILITY'S ADDRESS

5092 BEER ROAD

Street or P.O. Box

WILLIAMSBURG OH 45176

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	SODIUM HYDROXIDE	02	D002	5000	P
2	PAINT (SOLIDS)	08	D001	6000	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Page ____ of ____

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

specify facility to which all wastes on this page were sent

VIII. GENERATOR'S EPA I.D. NO.

T/AC

OHD980569388 121

IX. FACILITY'S EPA I.D. NO.

OHD000608388

X. FACILITY NAME

ENVIRONMENTAL PROCESSING SVCS

XI. FACILITY'S ADDRESS

1288 McCook Avenue

Street or P.O. Box

DAYTON OH 45404

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Perchloroethylene	1 2	U210	900	P
2	1,1,1 Trichloroethane	1 2	U226	5600	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by line item number)

Re Purchased as a Reconditioned material (Recycled)

Page _____ of _____

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code ____ ____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

Specify facility to which all wastes on this page were sent

VIII. GENERATOR'S EPA I.D. NO.

T AC

OHD980569388 12

1 2 13 14 15

IX. FACILITY'S EPA I.D. NO.

OHD093945293

10 17

X. FACILITY NAME

SOLVENT RESOURCE RECOVERY

18 59

XI. FACILITY'S ADDRESS

4301 INFIRMARY RD PO Box 453

28

Street or P.O. Box

WEST CARROLLTON OH 45449

28

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. U.S. EPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTE PAINT LIQUIDS	07	D001	6,100	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32

XIII. COMMENTS (enter information by section number)

Page ____ of ____

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(Specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

TAC

C O N D 9 8 0 5 6 9 3 8 8 | 12

IX. FACILITY'S EPA I.D. NO.

I N D 0 0 0 2 5 3 6 0 9

X. FACILITY NAME

INDIANA LIQUID WASTE

XI. FACILITY'S ADDRESS

7901 WEST MORRIS ST.

Street or P.O. Box

INDIANAPOLIS IN

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	CORROSIVE LIQUIDS	0 2	D002	52010	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Page _____ of _____

FOR DEPARTMENT USE:
Index Number _____
Date Received _____

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44396
BATON ROUGE, LOUISIANA

MANIFEST QUARTERLY REPORT

1. IDENTIFICATION NUMBER: LAD-755 QUARTER ENDING: 3/31/83
2. NAME OF COMPANY: Truck & Bus Mfg. Division - GMC
3. MAILING ADDRESS: P.O. Box 30011, Shreveport, La. 71130
4. CONTACT: T. R. Siegele TELEPHONE: 318/459-9267
5. HAZARDOUS WASTE HANDLED DURING THIS QUARTER:

Waste Number	Amount (Tons)	Waste Number	Amount (Tons)	Waste Number	Amount (Tons)
765-08 (EQCG)	260				
765-01 (D001)	3				

6. MANIFEST NUMBERS USED DURING THIS QUARTER:

83-001 thru	83-013				

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature T. R. Siegele Name and Title Env. Engineer 4/7/83 Date

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44066
BATON ROUGE, LOUISIANA 70804

GENERATOR MANIFEST QUARTERLY REPORT

IDENTIFICATION NUMBER: GD-765 QUARTER: circle one 1 (2) 3 4 , 19 83

NAME OF COMPANY: Truck & Bus Mfg. Div., GMC

MAILING ADDRESS: P.O. Box 30011, Shreveport, La. 71130

CONTACT: T. L. Whitman PHONE: 318/459-9267

SUMMARY OF HAZARDOUS WASTE GENERATED THIS QUARTER:

Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)
765-01 D001	31				
765-03	116				
765-05	14				
765-07	56				
765-08 F006	210				
)					
		Total Tons Generated:	427		

MANIFEST SEQUENCE NUMBERS USED DURING THIS QUARTER:

-014	thru 83-034				

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: T. L. Whitman Name and Title Env. Engineer Date 7-11-83

) additional sheets are required, please put your identification number and date on each sheet.

Additional instructions are on the back of this form.

HW-4 (R-6/83)

FOR DEPARTMENT USE:
Index Number _____
DateReceived _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44066
BATON ROUGE, LOUISIANA 70804

GENERATOR MANIFEST QUARTERLY REPORT

NTIFICATION NUMBER: GD-765 QUARTER: circle one 1 2 (3) 4 , 19 83

ME OF COMPANY: Truck & Bus Mfg. Div., General Motors Corporation

LING ADDRESS: P.O. Box 30011, Shreveport, La. 71130

TACT: T. L. Whitman PHONE: 318/459-9267

MARY OF HAZARDOUS WASTE GENERATED THIS QUARTER:

Code e Number	Amount (Tons)	Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)
55-01	12.94				
55-03	22				
55-05	19				
55-07	76				
55-08	285				
		Total Tons Generated:			

MANIFEST SEQUENCE NUMBERS USED DURING THIS QUARTER:

83-035	thru 83-056				

IFICATION: I have personally examined and am familiar with the information submitted in thi document, and I hereby certify under penalty of law that this information is tru accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibilit of fine and imprisonment.

ure: _____ 10/17/83

Name and Title F. J. Colicchio Director-Plant Engineering Date

dditional sheets are required, please put your identification number and date on each shee

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44066
BATON ROUGE, LOUISIANA 70804

GENERATOR MANIFEST QUARTERLY REPORT

TIFICATION NUMBER: GD-765 QUARTER: (circle one) 1 2 3 (4) , 19 83

E OF COMPANY: Truck & Bus Mfg. Div., General Motors Corporation

ING ADDRESS: P.O. Box 30011, Shreveport, La. 71130

TACT: T. L. Whitman PHONE: 318/459-9267

MARY OF HAZARDOUS WASTE GENERATED THIS QUARTER:

Code Number	Amount (Tons)	Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)
765-01	1				
765-03	21				
765-05	24				
765-07	96				
765-08	360				
		Total Tons Generated:	502		

MANIFEST SEQUENCE NUMBERS USED DURING THIS QUARTER:

83057	thru 83081				

FICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

re: F J Colucchio Dir Cft. Engr. January 24, 1984

F. J. Colicchio Director-Plant Engineering
Name and Title Date

ditional sheets are required, please put your identification number and date on each sheet

FOR DEPARTMENT USE:
Index Number: _____
Date Received: _____

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44396
BATON ROUGE, LOUISIANA 70804

QUARTERLY REPORT OF ON-SITE DISPOSAL

1. IDENTIFICATION NUMBER: GD-765 QUARTER ENDING: 3/31/83
2. NAME OF COMPANY: Truck & Bus Mfg. Division - GMC
3. MAILING ADDRESS: P.O. Box 30011, Shreveport, La. 71130
4. CONTACT: T. R. Siegele TELEPHONE: 318/459-9267
5. HAZARDOUS WASTE DISPOSED OF ON-SITE THIS QUARTER:

Waste Number	Amount in Tons	Method of Disposal
765-01 (D001)	18	S01 - Storage

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: T R Siegele Name T. R. Siegele Env. Engineer 4/7/83 Date Signed

FOR DEPARTMENT USE:
Index Number _____
DateReceived _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44396
BATON ROUGE, LOUISIANA 70804

ON-SITE DISPOSER QUARTERLY REPORT

1. IDENTIFICATION NUMBER: GD 765 QUARTER: circle one 1 (2) 3 4 , 19 83
2. NAME OF COMPANY: Truck & Bus Mfg. Div., GMC
3. MAILING ADDRESS: P.O. Box 30011, Shreveport, La. 71130
4. CONTACT: T. L. Whitman TELEPHONE: 318/459-9267
5. SUMMARY OF HAZARDOUS WASTE HANDLED THIS QUARTER:

Waste Number	Amount in Tons	Handling Code	Method of Disposal
765-01	18	501	Container Storage
TOTAL TONS HANDLED:	18		

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: T. L. Whitman Name Env. Engineer 7-11-83 Date Signed

If additional sheets are required, please put your identification number and the date on each sheet.

HW-4 R 6/83 Additional instructions are on the back of this form.

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44396
BATON ROUGE, LOUISIANA 70804

ON-SITE DISPOSER QUARTERLY REPORT

1. IDENTIFICATION NUMBER: GD-765 QUARTER: circle one 1 2 (3) 4 , 19 83
2. NAME OF COMPANY: Truck & Bus Mfg. Div., General Motors Corporation
3. MAILING ADDRESS: P.O. Box 30011, Shreveport, La. 71130
4. CONTACT: T. L. Whitman TELEPHONE: 318/459-9267
5. SUMMARY OF HAZARDOUS WASTE HANDLED THIS QUARTER:

Waste Number	Amount in Tons	Handling Code	Method of Disposal
765-01	18	SOT	Container Storage
TOTAL TONS HANDLED:			

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: _____ 10/17/83
F. J. Colicchio Name Director-Plant Engineering Date Signed

If additional sheets are required, please put your identification number and the date on each sheet.

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44306
BATON ROUGE, LOUISIANA 70804

ON-SITE DISPOSER QUARTERLY REPORT

1. IDENTIFICATION NUMBER: GD-765 QUARTER: circle 1 2 3 (4) . 19 83
2. NAME OF COMPANY: Truck & Bus Mfg. Div., General Motors Corporation
3. MAILING ADDRESS: P.O. Box 30011, Shreveport, La. 71130
4. CONTACT: T. L. Whitman TELEPHONE: 318/459-9267
5. SUMMARY OF HAZARDOUS WASTE HANDLED THIS QUARTER:

Waste Number	Amount in Tons	Handling Code	Method of Disposal
No on-site disposal this quarter			
TOTAL TONS HANDLED:			

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: F. J. Colicchio Name: F. J. Colicchio Director-Plant Engineering Date Signed: Jan. 24, 1984

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 4 | 8 | 4 | 1 | 1 | 4 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year. IND 058 484 114

X. FACILITY'S NAME (specify) FACILITY'S EPA ID NUMBER

| | | |

INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P.O Box 1964
Indianapolis, Indiana 46206

STATE of INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER I N D 0 0 6 4 1 3 3 4 8

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

IND. 058 404 114

X. FACILITY'S NAME (specify) R E I C H A I M E D E S E R V I C E S , I N C . FACILITY'S EPA ID NUMBER I N D 0 0 0 7 8 0 4 3 0

XI. FACILITY'S ADDRESS

Street or P. O. Box 1 5 0 0 W E S T E R N A V E N U E

City or Town C O N N E R S V I L L E State I N Zip 4 7 3 3 1

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	IGNITABLE WASTE, PAINT THINNER	0 8	D 0 0 1	8	P * (T)
2					P * T
3					P * T
4					P * T
5					P * T
6					P * T
7					P * T
8					P * T

XIII. COMMENTS (enter information by line number -- see instructions)

State Form 19286R
SW(6)-4812
Revised 10/82

MAY BE PHOTOCOPIED

INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O Box 1964
Indianapolis, Indiana 46206

STATE of INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 4 | 1 | 2 | 1 | 4 | 8 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year. WID 006435887

X. FACILITY'S NAME (specify) HOOSIER CHEMICAL DRUM CO

FACILITY'S EPA ID NUMBER | W | I | D | 0 | 0 | 6 | 0 | 8 | 8 | 2 | 4 |

XI. FACILITY'S ADDRESS

Street or P. O. Box 1 1 1 NORTH MAIN STREET

City or Town CLOVERDALE State | W | I | Zip | 5 | 3 | 5 | 2 | 7 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	SPENT HALOGENATED SOLVENT 1,1,1 - TRICHLOROETHANE	1 3	F 0 0 2	5 4	P * (T)
2					P * T
3					P * T
4					P * T
5					P * T
6					P * T
7					P * T
8					P * T

XIII. COMMENTS (enter information by line number -- see instructions)

MAY BE PHOTOCOPIED

INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 4 | 1 | 3 | 4 | 8 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year. IND 006 413 348

X. FACILITY'S NAME (specify) | A | L | L | I | S | O | N | | W | A | S | H | | I | N | D | I | A | N | A | P | O | L | I | S | | |

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

IND000804734 Plant 4 1022
Detroit Diesel Allison Div GMC
P.O. Box 894
Indianapolis IN 46206

FORM E: Installation Identification Form

ENVIRONMENTAL MANAGEMENT BOARD

INSTRUCTIONS: Please refer to the specific instructions before completing this form. The information requested herein is required by IC 13-7-8.5-2.

I. TYPE OF HAZARDOUS WASTE REPORT FOR THE YEAR ENDING DEC. 31, 19 81

FORM G: GENERATOR ANNUAL REPORT	[ ]	FORM F: FACILITY ANNUAL REPORT	[ ]
DID NOT GENERATE/TSD HAZARDOUS WASTE	[X]	SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE	[ ]

II. INSTALLATION'S EPA I.D. NUMBER: IND080679734

III. NAME OF INSTALLATION: PLANT 4 DETROIT DIESEL ALLISON GMC

IV. INSTALLATION MAILING ADDRESS

Street or P. O. Box: PO BOX 894

City or Town: INDIANAPOLIS

State: IN Zip Code: 46206

V. LOCATION OF INSTALLATION

Street or P. O. Box: 1255 MAIN ST

City or Town: INDIANAPOLIS

State: IN Zip Code: 46206 County: MARION

VI. INSTALLATION CONTACT

Last Name: SEWALL First Name: ROBERT Phone (area code & no.): 317/247-2366

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(A.) PRINT OR TYPE NAME	(B.) SIGNATURE	(C.) DATE SIGNED
R. J. NEUBACHER	R. J. Neubacher	2-24-82

Please print or type with ELITE type (12 characters per inch). PAGE 1 OF 1

SB1166-001 State Form 19288-A
Revised 10/82

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

IND000806810 Plant 10 1024
Detroit Diesel Allison Div GMC
P.O. Box 894
Indianapolis IN 46206

FORM E: Installation Identification Form

ENVIRONMENTAL MANAGEMENT BOARD

INSTRUCTIONS: Please refer to the specific instructions before completing this form. The information requested herein is required by IC 13-7-8.5-2.

I. TYPE OF HAZARDOUS WASTE REPORT FOR THE YEAR ENDING DEC. 31, 19 83

FORM G: GENERATOR ANNUAL REPORT	[ ]	FORM F: FACILITY ANNUAL REPORT	[ ]
DID NOT GENERATE/TSD HAZARDOUS WASTE	[X]	SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE	[ ]

II. INSTALLATION'S EPA I.D. NUMBER IND000806810

III. NAME OF INSTALLATION PLANT 10 DETROIT DIESEL ALLISON DIV GMC

IV. INSTALLATION MAILING ADDRESS

Street or P. O. Box P.O. BOX 894

City or Town INDIANAPOLIS State IN Zip Code 46206

V. LOCATION OF INSTALLATION

Street or P. O. Box 700 NORTH HOLT AVE

City or Town INDIANAPOLIS State IN Zip Code 46206 County MARION

VI. INSTALLATION CONTACT

Last Name	First Name	Phone (area code & no.)
SEWALL	ROBERT	317/247-2366

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(A.) PRINT OR TYPE NAME	(B.) SIGNATURE	(C.) DATE SIGNED
R. J. NEUBACHER	R. J. Neubacher	2-29-84

Please print or type with ELITE type (12 characters per inch). PAGE 1 OF 1

SD1166-001 State Form 19288A
Revised 10/82

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

IND000806802 Plant 12/14 1023
Detroit Diesel Allison Div GMC
P.O. Box 894
Indianapolis IN 46206

FORM E: Installation Identification Form

ENVIRONMENTAL MANAGEMENT BOARD

INSTRUCTIONS: Please refer to the specific instructions before completing this form. The information requested herein is required by IC 13-7-8.5-2.

I. TYPE OF HAZARDOUS WASTE REPORT FOR THE YEAR ENDING DEC. 31, 19 81

FORM G: GENERATOR ANNUAL REPORT	[X]	FORM F: FACILITY ANNUAL REPORT	[ ]
DID NOT GENERATE/TSD HAZARDOUS WASTE	[ ]	SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE	[ ]

II. INSTALLATION'S EPA I.D. NUMBER: IND000806802

III. NAME OF INSTALLATION: PLT 12/14 DETROIT DIESEL ALLISON GMC

IV. INSTALLATION MAILING ADDRESS

Street or P. O. Box: PO BOX 894

City or Town: INDIANAPOLIS State: IN Zip Code: 46206

V. LOCATION OF INSTALLATION

Street or P. O. Box: 901 GRANDE AVE

City or Town: INDIANAPOLIS State: IN Zip Code: 46206 County: MARION

VI. INSTALLATION CONTACT

Last Name: SEWALL First Name: ROBERT Phone (area code & no.): 317/241-2366

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. J. NEUBACHER		2-24-81
(A.) PRINT OR TYPE NAME	(B.) SIGNATURE	(C.) DATE SIGNED

*Please print or type with ELITE type (12 characters per inch).

SBH66-001 State Form 19288R
Revised 10/82

INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O Box 1964
Indianapolis, Indiana 46206

STATE of INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 1983

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 8 | 0 | 6 | 8 | 0 | 2 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

IND 006 413 348

X. FACILITY'S NAME (specify) | D | E | T | R | O | I | T | | D | I | E | S | E | L | | A | L | L | I | S | O | N | | D | I | V | | G | M | C | | FACILITY'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 4 | 1 | 3 | 3 | 4 | 8 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | P | O | | B | O | X | | 8 | 9 | 4 | | P | L | T | . | D | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information required herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

EPAC

O H D 0 0 4 2 9 1 0 9 1

1 2 13 14 15

II. NAME OF INSTALLATION

[redacted]

30 67

III. INSTALLATION MAILING ADDRESS

PO BOX 4025

15 16 45

Street or P.O. Box

ELYRIA OH 44036

15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

1400 LOWELL ST 47

15 16 45 County Code

ELYRIA OH 44035 3714

15 16 41 42 47 51 53 56

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

RANDALL LEWIS P[redacted] 216 329 1250

15 16 45 46 55

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTER SERVICES USED (list the name and EPA identification numbers of all hazardous waste transporters whose services were used)

METROPOLITAN ENVIRONMENTAL INT190010397
H. M. T. OHD980681670
ROSS TRANSPORTATION SERVICES OHD980614374
MET DRUM SERVICE NCD000603910
KAD INDUSTRIAL SERVICE MID072790710

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. M. BOWERS PLANT MANAGER [signature] 3/1/84

Print/Type Name Title Signature of Authorizing Representative Date Signed

EPA 8019 Page 1 of 6

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code. ___ ____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify for city in which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

OHD 004120109 12

IX. FACILITY'S EPA I.D. NO.

OHD044845665

X. FACILITY NAME

ROSS INCINERATION SERVICES INC

XI. FACILITY'S ADDRESS

394 GILES RD

Street or P.O. Box

GRAFTON OH 44044

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	IGNITABLE WASTE PAINT	01	D001	14,510	P
2	IGNITABLE WASTE SOLVENT	01	D001	31,819	P
3	IGNITABLE WASTE MOLD RELEASE	01	D001	1,415	P
4	IGNITABLE WASTE LIQUID CEMENT	01	D001	4,450	P
5	SPENT SOLVENT TRICHLOROETHYLENE	12	F001	7,810	P
6	STILL BOTTOM FROM SOLVENT RECOVERY III TRICHLOROETHANE	12	F002	2,263	P
7	OFF-SPEC, CONTAMINATED WASTE TOLUENE DIISOCYANATE, LIQUID	15	U223	1,956	P
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: __ _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(Identify the facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

OHD 014 210 197 12

IX. FACILITY'S EPA I.D. NO.

MID 096 963 194

X. FACILITY NAME

CHEM-MET SERVICES

XI. FACILITY'S ADDRESS

1850 ALLEN RD

Street or P.O. Box

MAYNARD TOWNSHIP MI 48620

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	EP TOXIC PAINT BOOTH SLUDGE CONTAINING CHROMIUM	12	D007	20755	P
2	EP TOXIC RACK STRIP SLUDGE & FILTER CAKE CONTAINING CHROMIUM	12	D007	2426	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

[redacted] HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

VIII. GENERATOR'S EPA I.D. NO.

G O H D 0 0 4 2 0 1 0 9 1 2

IX. FACILITY'S EPA I.D. NO. X. FACILITY NAME

O H D 0 4 5 2 4 3 7 0 6 [redacted]

XI. FACILITY'S ADDRESS

8 7 6 O T T E R C R E E K R D

Street or P.O. Box

O R E G O N O H 4 3 6 1 6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. HAZARD CLASS	C. EPA HAZARDOUS WASTE NO. (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTEWATER TREATMENT SLUDGE FROM ELECTROPLATING OPER.	12		38 0 6	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS

Page 3 of 3

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 11, 19 83

FACILITY INFORMATION

(Specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

OHD004201091 2

IX. FACILITY'S EPA I.D. NO.

OHD068111327

X. FACILITY NAME

ENVIRONGENE LANDFILL

XI. FACILITY'S ADDRESS

2625 EAST BROADWAY

Street or P.O. Box

NORTHWOOD

City or Town

OH 43614

State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTEWATER TREATMENT SLUDGE FROM ELECTROPLATING OPER.	12	F006	1200	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Do not make entries in shaded areas. OMB #: 2050-0024 Expires: 12-31-86

C ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

TAC G

F M I D 0 0 0 8 0 9 0 5 1 (1-12) TJD (13-15)

CBI ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

D E T R O I T D I E S E L A L L I S O N D I V I S I O N G M C (30-64)

IV. INSTALLATION MAILING ADDRESS

3 3 6 8 8 0 E C O R S E R O A D (15-45)
Street or P.O. Box

4 R O M U L U S M I 4 8 1 7 4 (15-41, 42-47, 48-51)
City or Town State Zip Code

Tear out here

V. LOCATION OF INSTALLATION (if different than section IV above)

5 (15-45)
Street or Route number

6 (15-41, 42-47, 48-51)
City or Town State Zip Code

VI. INSTALLATION CONTACT

2 R U M O H R L A W R E N C E (15-45)
Name (last and first)

3 1 3 – 5 9 5 – 5 3 9 1 (46-55)
Phone No. (area code & no.)

COPY

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

D. A. Lanius, Dir., Mfg. Engrg. _____ 3/16/84
Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(3-84) (Revised 11-84)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 0 8 0 9 9 0 5 T A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro-Chem Processing, Inc.

X. FACILITY'S EPA I.D. NO.

M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 Lycaste
Detroit, MI 48214

XII. TRANSPORTATION SERVICES USED

K & D Industrial Services
MID 072790710

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. Total Quantity of Hazardous Waste	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste Paint	0.8	D001	5813	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

COPY

...HAZARDOUS ... December 31, ... Form

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
C	M	I	D	0	0	0	8	0	9	9	0	5	F	T

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Safety Kleen Corporation

X. FACILITY'S EPA I.D. NO.

16	17	18	19	20	21	22	23	24	25	26	27	28
E	O	H	D	9	8	0	5	8	7	3	6	4

XI. FACILITY ADDRESS

581 Milliken S.E.
Hebron, OH 43023

XII. TRANSPORTATION SERVICES USED

A.C.E.S.
OHD 045247905

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
32	1	Waste Degreasing Solvent	1, 3	F, 0, 0, 1	1, 7, 2, 8, 0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

COPY

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 0 8 0 9 9 0 5 TAC 11

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

XI. FACILITY ADDRESS

27140 Princeton
Inkster, MI 48141

X. FACILITY'S EPA I.D. NO.

M I D 0 5 7 0 0 2 6 0 2

XII. TRANSPORTATION SERVICES USED

Ray Moulder, Inc.
MID 052042959

XIII. WASTE IDENTIFICATION

Sequence #	Year	A. Description of Waste	B. Form Code	Waste Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1		Waste Acid/Alum Water From Oil Reclaim Process	1	5	D007 D002	4895.00	P
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							

XIV. COMMENTS (enter information by section number—see instructions)

COPY

Tear out here

Before Completing Or Making Any Entries On This Form, Please Read The Instructions Carefully And Type Or Print In The Boxes Provided.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
G	M	T	D	0	0	0	8	0	9	9	0	5	F	1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

16												28

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence of	No. (enter)	A. Description of Waste	B. DOT Hazard Class (enter code)	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
28 32	1	Waste Kolene Salt	0,2 (33 34)	D,0,0,2 (35 38 39 42 43 46 47 50)	2,7,0,0 (51 59)	P (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

1983 Generated - Stored on-site less than 90 days as of December 31, 1983.

COPY

Do not make entries in [redacted] OMB o: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

[redacted]

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

FMID096063193 (1)

III. NAME OF INSTALLATION

DETROIT DIESEL ALLISON DIV GMC

IV. INSTALLATION MAILING ADDRESS

3134 00 West Outer Drive

Street or P.O. Box

4 Detroit MI 48239

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5

Street or Route number

6

City or Town State Zip Code

VI. INSTALLATION CONTACT

(2) MUNSUCKER OLIN

Name (last and first)

313-592-5680

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Gil Clark Gen'l Mfg Mgr.

Typed Name Title Signature of Authorized Representative Date Signed →

EPA Form 8700-13A(5-80) (Revised 11-83)

42-590 963

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 0 3 (F A C 1 1)

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 0 6 3 1 9 3

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Glasurit America, Inc.

XI. FACILITY ADDRESS

3301 Bourke Ave.
Detroit, Michigan 48239

XII. TRANSPORTATION SERVICES USED

Drury Bros. EPA ID# MID056988892

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	I. Unit of Measure
1	Toluene	08	F 0 0 5	3 8 3 4 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 0 3

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Safety Kleen Corp.

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 0 6 3 1 9 3

XI. FACILITY ADDRESS

581 Milliken Dr. S.E.
Hebron, Ohio 43025

XII. TRANSPORTATION SERVICES USED

A.C.E.S. EPA ID# OHD980587364

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (DOT Hazard Class)	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Trichloroethylene	13	F 0 0 1	6 0 7 4	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in [redacted]

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

Date rec'd: [redacted]

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 0 3 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petrochem Processing, Inc.

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 0 6 3 1 9 3

XI. FACILITY ADDRESS

421 Lycaste
Detroit, Mich. 48124

XII. TRANSPORTATION SERVICES USED

Drury Bros., Inc. EPA ID# MFD056988892

XIII. WASTE IDENTIFICATION

Sequence Number	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Alcohol	0 8	D 0 0 1	4,316	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in [redacted]

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: [redacted]

VIII. GENERATOR'S EPA I.D. NO.

GM I 0 0 0 5 3 5 6 8 0 3 T A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal, Inc. Site #2

X. FACILITY'S EPA I.D. NO.

FIM I 0 0 9 6 0 6 3 1 9 3

XI. FACILITY ADDRESS

49350 No. Service DR.
Belleville, Michigan 48111

XII. TRANSPORTATION SERVICES USED

Wolverine Disposal, Inc. EPA ID#MID068148202

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Kolene Salt Solids	0 2	D 0 0 2	2 1 8 1 7	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in [redacted]

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: [redacted]

VIII. GENERATOR'S EPA I.D. NO.

GM I 0 0 0 5 3 5 6 8 0 3 T/A C [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal, Inc. Site #2

X. FACILITY'S EPA I.D. NO.

MI D 0 0 9 6 0 6 3 1 9 3

XI. FACILITY ADDRESS

49350 No. Service Dr.
Belleville, Michgian 48111

XII. TRANSPORTATION SERVICES USED

Wolverine Disposal, Inc. EPA ID# MID068148202

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
25 27	1	Mercury Vapor Lamps	15	D009	1536	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in [redacted]

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

M I 0 0 5 3 5 6 1 8 0 3 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Nelson Industrial Service, Inc.

XI. FACILITY ADDRESS

12345 Schaefer
Detroit, Michigan 48227

X. FACILITY'S EPA I.D. NO.

M I 0 0 9 6 0 6 3 1 9 3

XII. TRANSPORTATION SERVICES USED

Nelson Industrial Services, Inc. EPA ID#MID0981992

XIII. WASTE IDENTIFICATION

Sequence of	No.	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Acid Alum Water	0 2	D 0 0 2	8 6 3 0 0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

OMB No. 2050-0024 Expires 12-31-85

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

(1) MIDO053568861 (17)

1 2 13 14 15

III. NAME OF INSTALLATION

PONTIAC MOTOR DIVISION OF GEN MOTORS (69)

30

IV. INSTALLATION MAILING ADDRESS

(3) ONE PONTIAC PLAZA (45)

15 16

Street or P.O. Box

(4) PONTIAC MI 48053 (51)

15 16 41 42 47

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(5) (45)

15 16

Street or Route number

(6) (51)

15 16 41 42 49

City or Town State Zip Code

VI. INSTALLATION CONTACT

(7) STRAUSSER VALORY (45)

15 16

Name (last and first)

(8) 313-857-2286

46 53

Phone No. (area code & no.)

VII. CERTIFICATION

This document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

D. G. UPTON GEN. MANUFACTURING MANAGER D G Upton 2-21-84

Print/Type Name Title Signature of Authorized Representative Date Signed

42-590 970

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 8 6

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL, INC., WAYNE, MI.

X. FACILITY'S EPA I.D. NO.

M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 N. SERVICE DR.
BELLEVILLE, MI. 48111

XII. TRANSPORTATION SERVICES USED

INDUSTRIAL WASTE TRANSPORTATION, INC.
2083 LONDON, LINCOLN PARK, MI. 48229

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	WASTE WATER TREATMENT SLUDGE FROM ELECTROPLATING	1,5	F 0 0 6	6 7 8 8 1 0 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 8 6 (I/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

PETROCHEM PROCESSING, INC.

X. FACILITY'S EPA I.D. NO.

M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 LYCASTE STREET
DETROIT, MICH. 48214

XII. TRANSPORTATION SERVICES USED

INLAND WATERS POLLUTION CONTROL, INC.
454 WEBSTER, ECORSE, MI. 48229

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	IGNITABLE LIQUID SPENT SOLVENT & DEGREASERS	0 8	D 0 0 1	4 7 4 8 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 8 6 [redacted] T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENVIRONMENTAL WASTE CONTROL, INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 PRINCETON AVE.
INKSTER, MICH. 48141

XII. TRANSPORTATION SERVICES USED

RAY MOLDER, INC.
8300 SOUTH BEECH-DALY
TAYLOR, MICH. 48180

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	CORROSIVE LIQUID SPENT PLATING BATH SOLUTION COPPER SULFATE	0 2	F 0 0 7	2 7 4	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 1 0 5 3 5 6 8 1 8 6 [redacted] T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL, INC.

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 1 0 0 7 2 4 8 3 1

XI. FACILITY ADDRESS

P.O. BOX 5187
DEARBORN, MICH. 48128

XII. TRANSPORTATION SERVICES USED

INDUSTRIAL WASTE TRANSPORTATION, INC., 2083 LONDON
LINCOLN PARK, MICH. 48229

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. RCRA Hazardous Waste	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	WASTE WATER TREATMENT SLUDGE FROM ELECTROPLATING OPERATIONS	1 5	F 0 0 6	1 0 5 9 6 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

T A C

T X M I D 0 0 5 3 5 6 9 1 0 1 7

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

III. NAME OF INSTALLATION

G M C P O N T I A C M O T O R D I V I S I O N P L A N T 1 7

IV. INSTALLATION MAILING ADDRESS

3 9 0 0 B A L D W I N

Street or P.O. Box

4 P O N T I A C M I 4 8 0 5 5

City or Town State Zip Code

Tear out here

V. LOCATION OF INSTALLATION (if different than section IV above)

5

Street or Route number

6

City or Town State Zip Code

VI. INSTALLATION CONTACT

7 C U N N I N G H A M M I K E

Name (last and first)

3 1 3 - 8 5 7 - 2 7 9 7

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

E. D. Schaefer Plant Manager Ernest D Schaefer 3/3/84

Print/Type Name Title Signature of Authorized Representative Date Signed

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 9 1 0 1

IX. FACILITY NAME (specify facility to which all waste on this page were shipped)

Wayne Disposal, Inc. Site #2

X. FACILITY'S EPA I.D. NO.

M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 N. Service Drive
Belleville, MI. 48055

XII. TRANSPORTATION SERVICES USED

American Waste - MID050598390

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Treatment Sludge from Electroplating	1,5	F 0 0 6	3,4,9,2	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

MI005356910

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chemical Recovery Systems

X. FACILITY'S EPA I.D. NO.

MID060975844

XI. FACILITY ADDRESS

36345 Van Born Road
Romulus, MI. 48174

XII. TRANSPORTATION SERVICES USED

Chemical Recovery Systems - MID 060975844

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. [illegible] Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Thinner	0,8	D,0,0,1	7,2,0,3,7	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd _____ Rec'd by _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 9 1 0

IX. FACILITY NAME (specify facility if some of waste in this page were shipped

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

F

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Treatment Sludge	1,5	F,0,0,6	3,6	T
2	Flammable Liquid	0,8	D,0,0,1	1,2,0,0	P
3	Thinner	0,8	D,0,0,1	2,0,0,0	P
4	Cement Liquid	0,8	D,0,0,1	9,0,0	P
5	Flammable Solid	0,9	D,0,0,1	1,2,0,0	P
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

1983 Generated -- Stored on-site less than 90 days as of December 31, 1983.

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

MID 050615996

III. NAME OF INSTALLATION

GMC TECHNICAL CENTER

IV. INSTALLATION MAILING ADDRESS

Street or P.O. Box: 30800 MOUND ROAD

City or Town: WARREN

State: MI Zip Code: 48090

V. LOCATION OF INSTALLATION (if different than section IV above)

Street or Route number:

City or Town:

State: Zip Code:

VI. INSTALLATION CONTACT

Name (last and first): BIEDA JOSEPH

Phone No. (area code & no.): 313-575-0218

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Print/Type Name	Title	Signature of Authorized Representative	Date Signed
George W. Perkins	Director	[signature]	3-1-84

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date received by: _____

VIII. GENERATOR'S EPA I.D. NO.

GMIDO506159961 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

FMIDO96963194

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, MI 48192

XII. TRANSPORTATION SERVICES USED

CHEM-MET SERVICES, INC	MID096963194
En-MAN-CO	MID980681621
K & D INDUSTRIAL SERVICES	MID072790710
PAUL O. SELLERS CO.	MID098079350

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. Density (lbs/gal)	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Methyl Alcohol (Windshield washer solvent)	0 8	U154D001	605	G
2	Dichloromethane (Spent solvent and sludge)	1 3	U080F001 F002	5245	G
3	Di-n-Octyl Phthalate		U107	165	G
4	Formaldehyde Solution (Formalin)	1 3	U122D004	110	G
5	Petroleum Naphtha	0 8	D001D006 D008	250	G
6	1,1,1-Trichloroethane (Spent solvent and sludge)	1 3	U226D001 D006D008	495	G
			D010F001 F002		
8	Xylene (Solvent mixture)	0 8	U239D001	155	G
9	Paint and paint sludge	0 8	D001	1845	G
10	Toluene and Water Mixture	0 8	U220D001	55	G
11	Methylethyl Ketone and Toluene Mixture	0 8	U159U220 D001	10	G
12	Resins and Cements	0 8	D001	2195	G

XIV. COMMENTS (enter information by section number—see instructions)

SECTION XIII:

LINE NO.	1	2	3	4	5	6	8	9	10	11	12
DENSITY, P/G	6.8	12.1	8.1	8.5	6.6	10.0	7.1	7.8	8.3	7.0	8.0

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: [redacted] Checked by: _____

VIII. GENERATOR'S EPA I.D. NO.

MIDO05061599 6 (EAC 1)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

FMIDO96963194

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, MI 48192

XII. TRANSPORTATION SERVICES USED

CHEM-MET SERVICES, INC.	MID096963194
DOETSCH INDUSTRIAL SERVICES, INC.	MID004914032
K & D INDUSTRIAL SERVICES	MID072790710
PAUL O. SELLERS COMPANY	MID098079350

XIII. WASTE IDENTIFICATION

Sequence of Line No.	A. Description of Waste	B. RCRA Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Oil Inteceptor Sludge	08	D001 D008	1200	G ✓
2	Lab Packs (63 DR)		D001	18900	P ✓
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

SECTION XIII

LINE NO.	1
DENSITY, P/G	8.3

Please make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date mailed: [redacted] Received by: _____

VIII. GENERATOR'S EPA I.D. NO.

MIID051061596 (1) (TAC)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENVIRONMENTAL WASTE CONTROL, INC.

X. FACILITY'S EPA I.D. NO.

FMID057002602

XI. FACILITY ADDRESS

27140 Princeton
Inkster, MI 48141

XII. TRANSPORTATION SERVICES USED

ENVIRONMENTAL WASTE CONTROL, INC. MID057002602

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Corrosive Liquid, N.O.S.	02	D002	2160	P
2	Flammable Solid, N.O.S.	09	D001	367	P
3	Electroplating Sludge	02	D002F006	1227	P
4	Chrome Electroplating Solution	02	D002D007	3000	P
5	Ferric Chloride Solution	02	D002	1800	P
6	Corrosive Liquid, N.O.S. (Metal Treatment Waste)	02	D002	1110	P
7	Lab Pack (1 DR)	02	D002	83	P
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date [redacted] by: _____

VIII. GENERATOR'S EPA I.D. NO.

MIDO05061596 (T A C: 1)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL, INC.

X. FACILITY'S EPA I.D. NO.

MIDOOO724831

XI. FACILITY ADDRESS

49350 N. I-94 Service Dr.
Belleville, MI 48111

XII. TRANSPORTATION SERVICES USED

INLAND WATER POLLUTION CONTROL MID000820365

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (X) if Hazardous Waste	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Ammonium Hydroxide		D002	3000	G
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS enter information by section number—see instructions)

SECTION XIII:

LINE NO.	1
DENSITY, P/G	7.5

Please make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted] by: _____

VIII. GENERATOR'S EPA I.D. NO.

T A C
MIID051061595961 1 1
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

NELSON INDUSTRIAL SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

FMIID098011992
16 28

XI. FACILITY ADDRESS

12345 Schaefer Highway
Detroit, MI 48227

XII. TRANSPORTATION SERVICES USED

NELSON INDUSTRIAL SERVICES, INC.

XIII. WASTE IDENTIFICATION

Sequence #	Item #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Cyanide, Dry, N.O.S.	18	P030 D003 (32 39 42)	2000 (33 34 35 39)	P (36)
	2	Electroplating Sludge	02	D002 F006	3374	P ✓
	3	(UREA) Formaldehyde	13	U122	55	G ✓
	4	Benzo [a] Pyrene		U022	1	P ✓
	5	Dimethylformamide	08	D001	50	G ✓
	6	Lead and Compounds, N.O.S.		D008	1	P ✓
	7	Antimony and Compounds, N.O.S.		013U	1	P ✓
	8	Nickel and Compounds, N.O.S.		096U	200	P ✓
	9	Lab Packs (16 DR)		D001 D002 D003	4800	P ✓
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

SECTION XIII:

LINE NO.	3	5
DENSITY, P/G	8.3	7.9

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 5 0 6 1 5 9 9 6 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

PETRO-CHEM PROCESSING, INC.

X. FACILITY'S EPA I.D. NO.

M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 Lycaste
Detroit, MI 48214

XII. TRANSPORTATION SERVICES USED

ENVIRONMENTAL MANAGEMENT COMPANY	MID980681621
INLAND WATERS POLLUTION CONTROL, INC.	MID000820365

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. RCRA Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Flammable Liquid, N.O.S. (Waste Fuels)	0 8	D 0 0 1	3 3 1 5 5 5	P ✓
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Please make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 5 0 6 1 5 9 9 6 (T&C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SAFETY-KLEEN CORP.

X. FACILITY'S EPA I.D. NO.

F O H D 9 8 0 5 8 7 3 6 4

XI. FACILITY ADDRESS

581 Milliken S.E.
Hebron, OH 43025

XII. TRANSPORTATION SERVICES USED

FONDESSY ACES OHD045247905

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1,1,1-Trichloroethane	13	U226F001	682	G
2	Petroleum Naphtha	08	D001	175	G
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

SECTION XIII:

LINE NO.	1	2
DENSITY, P/G	10.0	6.6

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 5 0 6 1 5 9 9 6 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SCA CHEMICAL SERVICES

X. FACILITY'S EPA I.D. NO.

I L D 0 0 0 6 7 2 1 2 1

XI. FACILITY ADDRESS

11700 S. Stony Island Ave.
Chicago, IL 60617

XII. TRANSPORTATION SERVICES USED

GREAT LAKES ENVIRONMENTAL MID087478574

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (Optional) Hazard Rank	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1,1,1-Trichloroethane	1 3	D 0 0 1 D 0 0 8 F 0 0 1 F 0 0 2	3 3 0	G
2			D 0 1 0 F 0 0 1 F 0 0 2		✓
3	Halogenated Solvent	1 3	D 0 0 1 D 0 0 8 F 0 0 1 F 0 0 2	9 3 5	G ✓
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

SECTION XIII

LINE NO.	1	3
DENSITY, P/G	10.0	8.6

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date received: [redacted] Received by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 5 0 6 1 5 9 6 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

U.S. CHEMICAL COMPANY

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 6 5 2 3 3 8 5

XI. FACILITY ADDRESS

29163 Calahan Street
Roseville, MI 48066

XII. TRANSPORTATION SERVICES USED

U.S. CHEMICAL COMPANY MID006523385

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (DOT) Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Dichloromethane	1 3	U 0 8 0 F 0 0 1 P 0 0 2	5 6 0	G ✓
2	1,1,1-Trichloroethane	1 3	U 2 2 6 F 0 0 1 F 0 0 2	1 3 4 5	G ✓
3	Paint Related Material	0 8	D 0 0 1 F 0 0 3	2 1 6 0 0	G ✓
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

SECTION XIII:

LINE NO.	1	2	3
DENSITY, P/G	12.1	10.0	7.2

[redacted] Expires 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

[redacted]

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

→ This Installation's Non-Regulated Status is Expected to Apply:

II. GENERATOR'S EPA I.D. NUMBER

F M I D 0 0 0 7 1 8 8 7 4 1 1

☐ For 1983 Only ☐ Permanently

☐ Other _____

CBS ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

C A D I L L A C M O T O R C A R D I V L I V O N I A P L A N T

IV. INSTALLATION MAILING ADDRESS

3 2 8 6 0 C L A R K

Street or P.O. Box

4 D E T R O I T M I 4 8 2 3 2

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5 1 2 2 0 0 M I D D L E B E L T

Street or Route number

6 L I V O N I A M I 4 8 1 5 0

City or Town State Zip Code

VI. INSTALLATION CONTACT

2 S W I K E S G E O R G E L

Name (last and first)

3 1 3 - 5 5 4 - 5 6 8 0

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. O. Grettenberger General Manager 2/24/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(3-80) (Revised 11-83)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont..

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MIDOO07188741 (TAC)

IX. FACILITY NAME (specify facility to which all wastes o (this page were shipped)

Wayne Disposal Site #2

XI. FACILITY ADDRESS

49350 N. Service Drive
Belleville, MI. 48111

X. FACILITY'S EPA I.D. NO.

MIDO48090633

XII. TRANSPORTATION SERVICES USED

Inland Waters Pollution Control

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (Do) Hazard Waste	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Water Treatment Sludge	1 2	F 0 0 6	9	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MIDOOO718874 (TAC)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

MIDO57002602

XI. FACILITY ADDRESS

27140 Princeton
Inkster, MI. 48141

XII. TRANSPORTATION SERVICES USED

Environmental Waste Control

XIII. WASTE IDENTIFICATION

Sequence #	Waste Indic.	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1		Waste Gasoline/ Water Mixture	0.7	D001	15600	G
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #1 - The density of Waste Gasoline/Water Mixture is 1.0 g/cc.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MIDOOO718747 (TAC 11)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro- Chem Processing

X. FACILITY'S EPA I.D. NO.

MID980615298

XI. FACILITY ADDRESS

421 Lycaste
Detroit, MI. 48214

XII. TRANSPORTATION SERVICES USED

K & D Industrial Services

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29-32	1	Waste Paint Thinner	07 (33-34)	D001 (35-38)	165 (39-42)	G (43)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #1 - The density of Waste Paint Thinner is 0.9 g/cc.

[redacted] OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

[redacted]

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please prinvtype with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A L

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
F	M	I	D	0	0	5	3	5	6	7	0	4		1

CMS ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

17

C A D I L L A C M O T O R C A R D I V C L A R K P L A N T

49

IV. INSTALLATION MAILING ADDRESS

15 16

3 2 8 6 0 C L A R K

43

Street or P.O. Box

15 16

4 D E T R O I T

41 42 47 51

M I 4 8 2 3 2

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16

5

43

Street or Route number

15 16

6

41 42 47 51

City or Town State Zip Code

[redacted]

VI. INSTALLATION CONTACT

15 16

7 S U K E S G E O R G E L

43

Name (last and first)

46 52

3 1 3 - 5 5 4 - 5 6 8 0

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. O. Grottenberger General Manager 2/26/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form [redacted] (Revised 11-83)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 7 0 4 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro-Chem Processing

X. FACILITY'S EPA I.D. NO.

M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 Lycaste
Detroit, Mi. 48214

XII. TRANSPORTATION SERVICES USED

Environmental Waste Control

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Paint (Black Dip)	0.7	D 0 0 1	1 6 0 0	G
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #1 - The density of Black Dip Paint is 0.9 g/cc.

The waste listed on this sheet was not stored on-site prior to disposal.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 7 0 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

XI. FACILITY ADDRESS

27140 Princeton
Inkster, Mi. 48141

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2

XII. TRANSPORTATION SERVICES USED

Environmental Waste Control

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (Vol) Hazard Rank	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Paint (Black Dip)	0.7	D 0 0 1	5 2 0 0	G
2	Waste Paint (Mechanical Dip)	0.7	D 0 0 1, D 0 0 8	2 0 0 0	G
3	Flammable Liquid/Water Mixture	0 1	D 0 0 1	9 8 5 0	G
4	Hazardous Waste, Liquid N.O.S. (Plating Interceptor Sludge)	1 2	F 0 0 6, D 0 0 7, D 0 0 8	2 2 8 0 0	G
5					
6					
7					
8					
9					
10					
11					
12					

F. Unit of Measure
T

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #1 - The density of Black Dip Paint is 0.9 g/cc.
Line #2 - The density of Mechanical Dip Paint is 1.0 g/cc.
Line #3 - The density of Flammable Liquid/Water Mixture is 1.0 g/cc.
Line #4 - The density of Plating Interceptor Sludge is 1.0 g/cc.
The waste listed on this sheet was not stored on-site prior to disposal.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MIDO053567041

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal Site #2

X. FACILITY'S EPA I.D. NO.

MIDO04809633

XI. FACILITY ADDRESS

49350 N. Service Drive
Belleville, MI. 48111

XII. TRANSPORTATION SERVICES USED

Inland Waters Pollution Control

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (Optional) Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Water Treatment Sludge	12	F006	108	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

The waste listed on this sheet was not stored on-site prior to disposal.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 7 0 4 6 1 7

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal Site #2

X. FACILITY'S EPA I.D. NO.

M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 N. Service Drive
Belleville, MI. 48111

XII. TRANSPORTATION SERVICES USED

Inland Waters Pollution Control

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Solid Hazardous Waste #3 & #4 Painting & Plating Sludges	1 2	D 0 0 8	2 3 2	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

The waste listed on this sheet was stored on-site prior to disposal.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MIDOO535704 (T A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Glasurit America

X. FACILITY'S EPA I.D. NO.

MIDOO713746

XI. FACILITY ADDRESS

3301 Burke
Detroit, Mi. 48238

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (1) Hazard (2) Toxic	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Paint	07	F001	2500	G
2	Waste Paint Thinner	07	F005	8800	G
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #1 - The density of Waste Paint is 1.0 g/cc.
Line #2 - The density of Waste Paint Thinner is 0.9 g/cc.

The waste listed on this sheet was stored on-site prior to disposal.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

T A C
MIDO053567041 17
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro-Chem Processing

X. FACILITY'S EPA I.D. NO.

MID980615298
16 28

XI. FACILITY ADDRESS

421 Lycaste
Detroit, MI. 48214

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. [illegible] Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	I. Unit of Measure
29 32	1	Waste Paint	0 7	F 0 0 1 35 38 39 42	2 5 0 0	G
33 34	2	Waste Paint Thinner	0 7	F 0 0 5 43 46 49 50	3 0 0 0	G
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #1 - The density of Waste Paint is 1.0 g/cc.
Line #2 - The density of Waste Paint Thinner is 0.9 g/cc.

The waste listed on this sheet was stored on-site prior to disposal.

Please make entries in shaded areas.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MIDOO535670411
(TAC)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

U. S. Chemical Company

X. FACILITY'S EPA I.D. NO.

FMIDOO652338 5

XI. FACILITY ADDRESS

29163 Calahan
Roseville, MI.

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (X) Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Paint Thinner	0.7	F.0.0.1	2500	G
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #1 - The density of Waste Paint Thinner is 0.9 g/cc.

The waste listed on this sheet was stored on-site prior to disposal.

Please print or type in the unshaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

G|M|T|0|0|5|3|5|6|7|0|4|1|1|
1 2 13 14 15 T A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CECOS Processing Center

X. FACILITY'S EPA I.D. NO.

F|O|H|D|0|0|0|8|1|6|6|2|9|
6 18

XI. FACILITY ADDRESS

4879 Spring Grove
Cincinnati, Ohio 45232

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental

XIII. WASTE IDENTIFICATION

Sequence #	State	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32			33 34	35 40	41 45	46
1		Waste Flammable Sealer	0 8	D 0 0 1	5 5 5 0	P
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

XIV. COMMENTS (enter information by section number—see instructions)

The waste listed on this sheet was stored on-site prior to disposal.

[illegible] entries in shaded areas

OMB no. 2050-0024 Expires 03-31-85

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

MIDOOO718B82 (1–12, 13 14 15)

III. NAME OF INSTALLATION

CADILLAC MOTOR CAR DIV. CONNER PLANT (10–69)

IV. INSTALLATION MAILING ADDRESS

Tear out here

3286O CLARK (15 16 – 45)
Street or P.O. Box

DETROIT (15 16 – 41) MI (42 43) 48232 (47 – 51)
City or Town — State — Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5950 CONNER (15 16 – 45)
Street or Route number

DETROIT (15 16 – 41) MI (42 43) 48213 (47 – 51)
City or Town — State — Zip Code

VI. INSTALLATION CONTACT

SUKES GEORGE L (15 16 – 45)
Name (last and first)

313-554-5680 (46 – 55)
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. O. Grettenberger — Print/Type Name
General Manager — Title
[signature] — Signature of Authorized Representative
2/6/84 — Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Please make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G|M|I|D|0|0|0|7|1|8|8|8|2|1|1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem- Met Services

X. FACILITY'S EPA I.D. NO.

F|M|I|D|0|9|6|9|6|3|1|9|4

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, Mi. 48192

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental
K & D Industrial Services

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Caustic De-rust Solution	0,2	D,0,0,2	1,5,0,5,0	G
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Read and Retain

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #1 - The density of Caustic De-rust Solution is 1.1 g/cc.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MIDOO07188821 (T & C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro-Chem Processing

X. FACILITY'S EPA I.D. NO.

MID980615298

XI. FACILITY ADDRESS

421 Lycaste
Detroit, MI. 48214

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. RCRA Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Paint Thinner	07	D001	725	G
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #1 - The density of Waste Paint Thinner is 0.9 g/cc.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MIDOOO718882 (TAC)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal Site #2

X. FACILITY'S EPA I.D. NO.

MID048090633

XI. FACILITY ADDRESS

49350 N. Service Drive
Belleville, MI. 48111

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental
K & D Industrial Services

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste IRS Wax		D005	5865	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

C M I 0 0 0 0 7 1 8 8 8 2 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CECOS / CER Company

X. FACILITY'S EPA I.D. NO.

F O H 0 0 8 7 4 3 3 7 4 4

XI. FACILITY ADDRESS

5092 Aber Road
Williamsburg, Ohio 45176

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental
K & D Industrial Services

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Flammable Sealer (Hood Mastic)	0 8	D 0 0 1	2 1 4 0	P
2	Waste Flammable Sealer (Weld-thru Sealer)	0 8	D 0 0 1	1 1 0	G
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Section XIII
Line #2 - The density of Weld-thru Sealer is 1.2 g/cc.

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

M I D 9 8 0 5 6 8 7 4 5 (T A C) T

(1 2 13 14 15)

CBIS ENTRY (OFFICIAL USE ONLY) ☐

III. NAME OF INSTALLATION

G M C A C S P A R K P L U G - A V E R I L L A V E N U E (30 69)

IV. INSTALLATION MAILING ADDRESS

1300 NORTH HIGHWAY (15 16 45)

Street or P.O. Box

FLINT MI 48556 (15 16 41 42 47 51)

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

4143 DAVISON ROAD (15 16 45)

Street or Route number

FLINT MI 48556 (15 16 41 42 47 51)

City or Town State Zip Code

VI. INSTALLATION CONTACT

GORDON LASCHUETZ (15 16 45)

Name (last and first)

313-257-6257 (46 55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

K.M. Hopkins - Dir. of Plt. Eng. & Toolrooms — 2/27/84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13A (3-80) (Revised 11-83)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 9 8 0 5 6 8 7 4 5 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEMICAL RECOVERY SYSTEMS

X. FACILITY'S EPA I.D. NO.

M I D 0 6 0 9 7 5 8 4 4

XI. FACILITY ADDRESS

36345 VanBORN ROAD

ROMULUS, MI 48174

XII. TRANSPORTATION SERVICES USED

CHEMICAL RECOVERY SYSTEMS MID 060975844

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste thinner-used in manufacturing of auto parts.	0 7	D 0 0 1	1 1 2 . 7	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Waste thinner was reprocessed by Chemical Recovery Systems and returned to AC for reuse.

Tear out here

Do not enter in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Tear out here

VIII. GENERATOR'S EPA I.D. NO.

M I D 9 8 0 5 6 8 7 4 5 T/A C
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I D 0 0 9 6 9 6 3 1 9 4
16 28

XI. FACILITY ADDRESS

18550 ALLEN ROAD

WYANDOTTE, MI 48192

XII. TRANSPORTATION SERVICES USED

INLAND WATER POLLUTION CONTROL MID 000820365

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. DOT Hazard code (33 34)	C. EPA Hazardous Waste No. (see instructions) (35 38 39 42 43 46 47 50)	D. Amount of Waste (51 59)	E. Unit of Measure (60)
1	Process Waste Sludge Manufacture of auto accessories	1 2	D 0 0 7	3 4 . 0	T
2	Paint Sludge (water soluble) Manufacture of auto parts	1 2	D 0 0 7 D 0 0 8	2 4 . 8	T
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.
M I D 9 8 0 5 6 8 7 4 5 T/A C 1 1
(1 2 13 14 15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
ENVIRONMENTAL WASTE CONTROL

X. FACILITY'S EPA I.D. NO.
M I D 0 5 7 0 0 2 6 0 2
(16 28)

XI. FACILITY ADDRESS
27140 PRINCETON AVENUE
P.O. BOX 431
INKSTER, MI 48141

XII. TRANSPORTATION SERVICES USED
DRURY BROS., INC. MID 056988892
ENVIRONMENTAL WASTE CONTROL MID 057002602

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Oil waste (used in machines in manufacture of auto accessories	1 2 (33 34)	D 0 0 8 (35 38 39 42)	1 0 4 . 3 (43 46 47 50 51 52)	T (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)
OIL WASTE SOLD FOR REVENUE. (RECYCLABLE)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I 0 9 8 9 5 6 8 7 4 5 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

GENERAL OIL

X. FACILITY'S EPA I.D. NO.

M I D 0 4 7 1 8 9 5 6 8

XI. FACILITY ADDRESS

12680 BEECH DALY

REDFORD, MI 48239

XII. TRANSPORTATION SERVICES USED

GREAT NORTHERN OIL MID 020849972

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	011 waste (used in machinery in manufacture of auto accessories	1 2	D 0 0 5	8.4	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

OIL WASTE SOLD FOR REVENUE (RECYCLABLE)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date Rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I 0 9 8 0 5 6 8 7 4 5 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I 0 0 0 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI 48192

XII. TRANSPORTATION SERVICES USED

CHEM-MET SERVICES MID 096963194

XIII. WASTE IDENTIFICATION

Sequence of	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Plastisol waste (used in manufacture of auto parts)		D 0 0 1	2,8	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

EPA ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T A C

M I D 0 0 5 3 5 6 6 4 7 [ ] [ ]

1 2 13 14 15

III. NAME OF INSTALLATION

GMC AC SPARK PLUG

30 69

IV. INSTALLATION MAILING ADDRESS

1300 NORTH DORT HIGHWAY

15 16 45

Street or P.O. Box

FLINT MI 48556

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 45

Street or Route number

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

GORDON SCHULTZ

15 16 45

Name (last and first)

3 1 3 - 2 5 7 - 6 2 5 7

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

K.M. Hopkins-Dir.of Plt.Eng.& Toolrooms K M Hopkins 2/27/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(5-80) (Revised 1-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 6 4 7 T/A/C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENVIRONMENTAL WASTE CONTROL

X. FACILITY'S EPA I.D. NO.

M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 PRINCETON AVENUE
P.O. BOX 431
INKSTER, MI 48141

XII. TRANSPORTATION SERVICES USED

DRURY BROTHERS INC.	MID 056988892
RAY MOLDER TRANSPORT	MID 052042959
ENVIRONMENTAL WASTE CONTROL	MID 057002602

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste oil (used in machinery to manufacture auto accessories)	1 2	D 0 0 8	3 5 8.7	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

WASTE OIL IS SOLD FOR REVENUE. (RECYCLABLE)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 4 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

GENERAL OIL

X. FACILITY'S EPA I.D. NO.

M I D 0 4 7 1 8 9 5 6 8

XI. FACILITY ADDRESS

12680 BEECH DALY

REDFORD, MI 48239

XII. TRANSPORTATION SERVICES USED

S & C TRANSPORT MID 099658288

GREAT NORTHERN OIL MID 020849972

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste oil (used in machinery to manufacture auto accessories)	1 2	D 0 0 8	1 4 5 3	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

WASTE OIL IS SOLD FOR REVENUE. (RECYCLABLE)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date received by:

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 4 7 T/A C
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4
16 28

XI. FACILITY ADDRESS

18550 ALLEN ROAD

WYANDOTTE, MI 48192

XII. TRANSPORTATION SERVICES USED

CHEM-MET SERVICES, INC. MID 096963194

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Caustic waste (used in manufacture of auto accessories)	02	D002	7,33	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Type or print entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 6 4 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL

X. FACILITY'S EPA I.D. NO.

M I D 0 0 0 7 2 4 8 3 1

XI. FACILITY ADDRESS

49350 N I94 SERVICE DRIVE

BELLEVILLE, MI 48111

XII. TRANSPORTATION SERVICES USED

WOLVERINE DISPOSAL, INC. MID 086148202

XIII. WASTE IDENTIFICATION

Source #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Caustic waste (used in manufacture of auto accessories)	02	D002	26.0	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.
M I D 0 0 5 3 5 6 6 4 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
PETRO CHEM PROCESSING

X. FACILITY'S EPA I.D. NO.
M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS
421 LYCASTE
DETROIT MI 48124

XII. TRANSPORTATION SERVICES USED
DRURY BROTHERS MID 056988892

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste freon (used in manufacture of auto accessories)	0 7	D 0 0 1	1 5.7	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 6 4 7 (T/A C) (blank)

X. FACILITY'S EPA I.D. NO.

M I D 0 0 7 1 3 8 7 4 6

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

COOK INDUSTRIAL COATINGS, INC.

XI. FACILITY ADDRESS

3301 BOURKE

DETROIT, MI 48238

XII. TRANSPORTATION SERVICES USED

DRURY BROTHERS MID 956988892

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste stoddard solvent (used to test fuel pumps)	0 1	D 0 0 1	5.6	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

STODDARD SOLVENT SOLD FOR REPROCESSING (REVENUE)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date received:

VIII. GENERATOR'S EPA I.D. NO.

M I 0 0 0 5 3 5 6 6 4 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

PETRO CHEM PROCESSING, INC.

X. FACILITY'S EPA I.D. NO.

M I 0 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 LYCASTE

DETROIT, MI 48214

XII. TRANSPORTATION SERVICES USED

DRURY BROTHERS MID 056988892

XIII. WASTE IDENTIFICATION

SOURCE ID	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste gasoline (used in testing spark plugs)	0 7	D 0 0 1	6.5	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 6 3 6 6 4 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

PETRO CHEM PROCESSING

X. FACILITY'S EPA I.D. NO.

M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 LYCASTE

DETROIT, MI 48124

XII. TRANSPORTATION SERVICES USED

DRURY BROTHERS MID 056988892

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1	Waste solvents-generated from manufacture of auto accessories	07	D001	1645	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 6 4 7 (T/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENVIRONMENTAL WASTE CONTROL INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 PRINCETON AVENUE
P.O. BOX 431
INKSTER, MI 48141

XII. TRANSPORTATION SERVICES USED

GREAT LAKES ENVIRONMENTAL DIVISION MID 087478574

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste cyanide (used in manufacture of auto accessories.)		D 0 0 3 D 0 0 2	2 5 9	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 6 4 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD

WYANDOTTE, MI 48192

XII. TRANSPORTATION SERVICES USED

CHEM-MET SERVICES MID 096963194

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Soluble oil waste		D007	25.9	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Tear out here

VIII. GENERATOR'S EPA I.D. NO.

M I 0 0 0 5 3 5 6 1 4 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL

X. FACILITY'S EPA I.D. NO.

M I 0 0 0 7 2 4 8 3 1

XI. FACILITY ADDRESS

49360 N. I94 SERVICE DRIVE

BELLEVILLE, MI 48111

XII. TRANSPORTATION SERVICES USED

WOLVERINE DISPOSAL MID 086148202

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Soluble oil waste used in manufacture of auto accessories.	12	0 0 0 7	16.2	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 6 4 7 (T A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

COOK INDUSTRIAL COATINGS

X. FACILITY'S EPA I.D. NO.

M I D 0 0 7 1 3 8 7 4 6

XI. FACILITY ADDRESS

3301 BOURKE

DETROIT, MI 48238

XII. TRANSPORTATION SERVICES USED

DRURY BROTHERS MID 056988892

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Salvage solvents 111 trichlor used in degreasing metal parts.	07	F002 F003	1160	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

*TRICHLOROETHANE 111 SOLD FOR REVENUE (RECYCLABLE)

Tear out here

Do not make entries in shaded areas.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date received

VIII. GENERATOR'S EPA I.D. NO.

M I 0 0 0 5 3 5 6 6 4 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

U.S. CHEMICAL CO., INC.

X. FACILITY'S EPA I.D. NO.

M I 0 9 0 6 5 2 3 3 8 5

XI. FACILITY ADDRESS

29163 CALAHAN

ROSEVILLE, MI 48066

XII. TRANSPORTATION SERVICES USED

U.S. CHEMICAL INC. MID 006523385

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Salvage solvent (111 trichlor) used in degreasing metal parts.	0 7	F 0 0 2 / F 0 0 3 / D 0 0 1 / D 0 0 7	2 0 4 1	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

*TRICHLOROETHANE 111 SOLD FOR REVENUE (RECYCLABLE)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 6 4 7 (1 2 ... 13 14 15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL

X. FACILITY'S EPA I.D. NO.

M I D 0 0 0 7 2 4 8 3 1 (16 ... 28)

XI. FACILITY ADDRESS

49350 N. I94 SERVICE DRIVE

BELLEVILLE, MI 48111

XII. TRANSPORTATION SERVICES USED

WOLVERINE DISPOSAL INC. MID 086148202

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Barium ferrite powder (used in manufacture of auto accessories	1, 2	D, 0, 0, 5	1, 4	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

OMB # 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print or type with ultra type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

C M I D 9 8 0 5 6 8 6 2 0 C T
1 2 13 14 15

CBS ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

G M C A C S P A R K P L U G D I V. [illegible]
30 69

IV. INSTALLATION MAILING ADDRESS

1 3 0 0 N O R T H D O R T H I G H W A Y
15 16 45
Street or P.O. Box

F L I N T M I 4 8 5 0 5
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

1 6 0 1 N O R T H A V E R I L L A V E N U E
15 16 45
Street or Route number

F L I N T M I 4 8 5 0 5
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

G O R D O N L I S C H U L I T Z
15 16 45
Name (last and first)

3 1 3 – 2 5 7 – 2 2 5 7
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

K.M. Hopkins-Dir. of Plt. Eng & Toolrooms K M Hopkins 2/27/84
Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A (8-80) (Revised 11-83)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 9 8 0 5 6 8 6 2 0 (T R C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

FONDESSY ENTERPRISES, INC.

X. FACILITY'S EPA I.D. NO.

O H D 0 4 5 2 4 3 7 0 6

XI. FACILITY ADDRESS

876 OTTER CREEK ROAD
P.O. BOX 7571
OREGON, OHIO 43616

XII. TRANSPORTATION SERVICES USED

ACES TRUCKING OHD 045247905

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. (for) Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Contaminated soil (dirt contaminated from leaking tank)		D 0 0 1 9 D 0 0 8	1 7 5,5	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

SOIL CONTAMINATED FROM A LEAKING TANK WHICH CONTAINED A RATING FUEL USED TO RUN CAR ENGINES TESTING SPARK PLUGS. THIS FUEL CONTAINED BENZENE.

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 5 7 0 0 2 6 0 2 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENVIRONMENTAL WASTE CONTROL, INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 PRINCETON AVENUE
P.O. BOX 431
INKSTER, MI 48141

XII. TRANSPORTATION SERVICES USED

ENVIRONMENTAL WASTE CONTROL, INC. MID 057002602

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste oil (used in machines to manufacture auto accessories)	1 2	D 0 0 8	1 6 7	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

WASTE OIL SOLD FOR REVENUE (RECYCLABLE)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 7 0 0 2 6 0 2 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

GENERAL OIL

X. FACILITY'S EPA I.D. NO.

M I D 0 0 4 7 1 8 9 5 6 8

XI. FACILITY ADDRESS

12680 BEECH DALY

REDFORD, MI 48239

XII. TRANSPORTATION SERVICES USED

GREAT NORTHERN OIL MID 020849972

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1	Waste oil (used in machines to manufacture auto accessories)	10	D018	9.5	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number--see instructions)

WASTE OIL SOLD FOR REVENUE (RECYCLABLE)

Do not make entries in shaded areas

OMB No. 2050-0024 Expires 12-31-84

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T/A/C

MID985685715 (13 14 15)

EDS ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION (30–69)

GMC ACS PAURK PLUG DTV MALSTES TREATMENT

IV. INSTALLATION MAILING ADDRESS

1300 NORTH HIGHWAY (15 16 – 45)

Street or P.O. Box

FLINT (15 16 – 41 42) MI (41 42 – 47) 48556 (47 – 51)

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

3026 ROBERT T LONG BLVD (15 16 – 45)

Street or Route number

FLINT (15 16 – 41 42) MI (41 42 – 47) 48556 (47 – 51)

City or Town State Zip Code

VI. INSTALLATION CONTACT

GORDON LASCHUTZ (15 16 – 45)

Name (last and first)

313-767-6257 (46 – 55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify, under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

K.M. Hopkins	Dir. of Plt. Eng. & Toolrooms	K M Hopkins	2/27/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8700-13A (5-80) [Revised 11-83]

Page 1 of 2

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Check'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 9 8 0 5 6 8 5 7 0 (T A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL SITE #2

X. FACILITY'S EPA I.D. NO.

M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE

BELLEVILLE, MI 48111

XII. TRANSPORTATION SERVICES USED

J & W LEASING MIT 270019672

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1	Water treatment sludge (generated from manufacture of auto accessories)	1 2	F 0 0 6	2,213	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

1ST Qtr 83

HAZARDOUS WASTE REPORT

WISCONSIN STATUTES 144

Reporting Period: JANUARY 1, 1983 - MARCH 31, 1983

Please complete all applicable portions of this form and return it to the appropriate District office indicated on the attached map.

Facility Name: AC Spark Plug Div., GMC
EPA ID Number: WIDO71147813

Contact Person: A. Andis, J. Larner
Telephone Number: (414) 768-3406
(414) 768-3573

Location Address: 7929 So. Howell Avenue
Oak Creek, WI 53154
County: Milwaukee

1. What is the total amount of hazardous waste originally generated at your facility during the reporting period? (Include only wastes actually created by your manufacturing processes or use of materials. Exclude wastes received from others and wastes coming from your hazardous waste treatment process or storage operations.) 3000 pounds

2. What is the total amount of hazardous waste you shipped off your property during the reporting period? 18,760 pounds

3. Where was the hazardous waste sent when it was shipped off your property? (Attach additional sheet if needed)

	Name	Type of Facility	E.P.A. ID No. (if known)	Location (City & State)
1.	Metro Disposal	Disposal Site	WIDO098547854	Franklin, WI
2.				

4. How much hazardous waste did you receive from others at your facility during the reporting period? -0- pounds

5. Who did you receive hazardous waste from when you received it at your facility during the reporting period? (Attach additional sheet if needed)

	Name	EPA ID Number (if known)	Location (City & State)
1.			
2.			

3rd Qtr 83

File Copy
12/8/83

HAZARDOUS WASTE REPORT

WISCONSIN STATUTES 144

Reporting Period: July 1, 1983 - September 30, 1983

Please complete all applicable portions of this form and return it to the appropriate District office indicated on the attached map.

Facility Name: AC Spark Plug

EPA ID Number: WID071197813

Contact Person: A. Andis
J. Larner

Telephone Number: (414) 768-3406
(414) 768-3573

Location Address: 7929 So. Howell Avenue
Oak Creek, WI 53154

County: Milwaukee

1. What is the total amount of hazardous waste originally generated at your facility during the reporting period? (Include only wastes actually created by your manufacturing processes or use of materials. Exclude wastes received from others and wastes coming from your hazardous waste treatment process or storage operations.) 4000 pounds

2. What is the total amount of hazardous waste you shipped off your property during the reporting period? 2980 pounds

3. Where was the hazardous waste sent when it was shipped off of your property? (Attach additional sheet if needed)

Name	Type of Facility	E.P.A. ID No. (if known)	Location (City & State)
1. Hydrite Chemical Co.	Reclamation	WID000808824	114 N. Main St. Cottage Grove, WI 53527
2.			

4. How much hazardous waste did you receive from others at your facility during the reporting period? -0- pounds

5. Who did you receive hazardous waste from when you received it at your facility during the reporting period? (Attach additional sheet if needed)

Name	EPA ID Number (if known)	Location (City & State)
1.		
2.		

4th Qtr 83 Corp

FACILITY QUARTERLY HAZARDOUS WASTE REPORT

WISCONSIN STATUTES 144

Reporting Period: October 1, 1983 - December 31, 1983

Please complete all applicable portions of this form and return it to the appropriate District office indicated on the attached map.

WID071147813 2 41 66 L
GENERAL MOTORS CORP A C SPARK PLUG
7929 SOUTH HOWELL AVENUE
OAK CREEK WI 53154

EPA ID Number: WID 071147813
Facility Name: AC Spark Plug Div., GMC
Contact Person: A. R. Andis, J. R. Larner
Mailing Address: P.O. Box 562
Mailing City: Milwaukee, WI 53201
Location Address: 7929 So. Howell Ave., Oak Creek
County: Milwaukee
Telephone Number: (414) 768-3406

1. How much hazardous waste did you actually have at your facility site on October 1, 1983?
1,500 pounds

2. What is the total amount of hazardous waste originally generated at your facility during the reporting period? (Include only wastes actually created by your manufacturing processes or use of materials. Exclude wastes received from others and wastes coming from your hazardous waste treatment process or storage operations.)
6,300 pounds

3. What is the total amount of hazardous waste you shipped off your property during the reporting period?
1,200 pounds

4. Where was the hazardous waste sent when it was shipped off of your property? (Attach additional sheet if needed)

	Name	Type of Facility	E.P.A. ID No.	Location (City & State)
1.	Chem Waste Mgmt - Ala.	Disposal Site	ALD000622464	Emelee, Ala.
2.	Amer. Indust. Waste	Processing prior to disposal.	TND908729305	White Bluff, TN
3.	Hydrite Chem.	Process/Disposal	WID000808824	Cottage Grove, WI

5. How much hazardous waste did you receive from others at your facility during the reporting period?
0 pounds

6. Who did you receive hazardous waste from when you received it at your facility during the reporting period? (Attach additional sheet if needed)

	Name	EPA ID Number	Location (City & State)
1.		None	
2.			

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

IN0980503825
Delco-Remy Div. GMC
Acre Area
Anderson

954

IN 46011

FORM E:

Installation Identification Form

ENVIRONMENTAL MANAGEMENT BOARD

INSTRUCTIONS: Please refer to the specific instructions before completing this form. The information requested herein is required by IC 13-7-8.5-2.

I. TYPE OF HAZARDOUS WASTE REPORT FOR THE YEAR ENDING DEC. 31, 19 83

FORM G: GENERATOR ANNUAL REPORT	[X]	FORM F: FACILITY ANNUAL REPORT	[X]
DID NOT GENERATE/TSD HAZARDOUS WASTE	[ ]	SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE	[ ]

II. INSTALLATION'S EPA I.D. NUMBER

III. NAME OF INSTALLATION

IV. INSTALLATION MAILING ADDRESS

Street or P. O. Box

City or Town

State | Zip Code

V. LOCATION OF INSTALLATION

Street or P. O. Box

City or Town

State | Zip Code | County

VI. INSTALLATION CONTACT

Last Name	First Name	Phone (area code & no.)
Bryant	Lisa	317/644-3280

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(A.) PRINT OR TYPE NAME	(B.) SIGNATURE	(C.) DATE SIGNED
Leland G. Robinson	Leland G. Robinson	2/27/84

Please print or type with ELITE type (12 characters per inch).

SF 56-001 State Form 10000

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 1983

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I|N|D|9|8|0|5|0|3|8|2|5|

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

IND058484114
IND048522460
~~IND069748092~~
AED 069748192
OHD087433744
WID023463128
WVD000603340

X. FACILITY'S NAME (specify) | A|t|l|a|n|t|i|c| |C|o|n|c|r|e|t|e| | | |

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 1983

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I W D 0 1 9 1 0 1 0 5 0 1 3 8 1 1 5 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) | I L I W D I I I N C I | FACILITY'S EPA ID NUMBER | I I N I D 0 9 1 3 1 2 1 1 9 1 0 1 1 2 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 7 1 9 1 0 1 1 | W | 1 9 0 1 R I I S | S T R E E T |

City or Town | I N D I A N A P O L I S | State | I N | Zip | 4 6 2 3 1 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	WASTE WATER TREATMENT SLUDGE	1 5	F 0 0 6	1 1 1 1 0 1 7 8	P (T)
2	CAUSTIC ZINC PLATING	0 2	D 0 0 2	1 1 3 1 3 6 0 0	(P) T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 1983

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 9 | 8 | 0 | 5 | 0 | 3 | 8 | 2 | 5 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) [redacted] FACILITY'S EPA ID NUMBER | I | N | D | 9 | 8 | 0 | 5 | 0 | 3 | 8 | 2 | 5 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 5 | 0 | 9 | 3 | A | b | e | r | S | c | a | d |

City or Town | W | I | l | l | i | a | m | s | b | u | r | g | State | O | H | Zip | 2 | 6 | 1 | 1 | 8 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Phosphate Soap Sludge	0 2	D 0 0 2	6 6 0 0 0	P (T)
2					P T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

State Form 19288-R
Revised 10/82

MAY BE PHOTOCOPIED

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE -- INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 1983

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 9 | 8 | 0 | 5 | 4 | 3 | 8 | 2 | 5 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) [illegible] FACILITY'S EPA ID NUMBER | K | Y | D | 0 | 5 | 4 | 8 | 1 | 0 | 8 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | S | T | A | T | E | H | W | Y | 1 | 4 | 6 |

City or Town | N | E | W | C | A | S | T | L | E | State | K | Y | Zip | 4 | 0 | 5 | 0 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Flammable Solvent (Lacquer Thinner) Maintenance Clean-up	8	D 0 0 1	2400	(P) T
2	1,1,1 Trichlorethane; Cleaning Solvent for Epoxy System	13	F 0 0 1	3000	(P) T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

IND980503940 963
General Motors Corp-Delco Remy
Columbus Avenue Area
Anderson IN 46011

FORM E:

Installation Identification Form

ENVIRONMENTAL MANAGEMENT BOARD

INSTRUCTIONS: Please refer to the specific instructions before completing this form. The information requested herein is required by IC 13-7-8.5-2.

I. TYPE OF HAZARDOUS WASTE REPORT FOR THE YEAR ENDING DEC. 31, 19 81

FORM G: GENERATOR ANNUAL REPORT	[X]	FORM F: FACILITY ANNUAL REPORT	[ ]
DID NOT GENERATE/TSD HAZARDOUS WASTE	[ ]	SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE	[ ]

II. INSTALLATION'S EPA I.D. NUMBER

III. NAME OF INSTALLATION

IV. INSTALLATION MAILING ADDRESS

Street or P. O. Box

City or Town

State Zip Code

V. LOCATION OF INSTALLATION

Street or P. O. Box

City or Town

State Zip Code County

VI. INSTALLATION CONTACT

Last Name First Name Phone (area code & no.)

		3 1 7 / 6 4 6 - 3 2 8 0

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Leland G. Robinson	Leland G. Robinson	2/27/84
(A.) PRINT OR TYPE NAME	(B.) SIGNATURE	(C.) DATE SIGNED

Please print or type with ELITE type (12 characters per inch).

Revised 10/82

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 9 | 8 | 0 | 5 | 0 | 3 | 9 | 4 | 0 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

IND980503825

IND980503940

X. FACILITY'S NAME (specify) [redacted] FACILITY'S EPA ID NUMBER | I | N | D | 9 | 8 | 0 | 5 | 0 | 3 | 8 | 2 | 5 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | A | r | a | A | r | a | a |

City or Town | A | n | d | e | r | s | o | n | State | I | N | Zip | 4 | 6 | 0 | 1 | 8 |

XII. WASTE IDENTIFICAYION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Flammable Solvent (laquer thinner) Maintenance clean-up	0 8	D 0 0 1	3 2 9 6	(P) T
2	1, 1, 1 Trichlordathane: cleaning for epoxy operation	1 3	F 0 0 1	1 2 0 0	(P) T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 __

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) FACILITY'S EPA ID NUMBER

XI. FACILITY'S ADDRESS

Street or P. O. Box

City or Town State Zip

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1					P T
2					P T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

JUN 27 RECD

GM Assembly Division General Motors Corporation

Arlington Plant
2525 East Abram Street
Arlington, Texas 76010

84-PE-101

June 23, 1984

Mitch Zdyb
Environmental Activities Staff
General Motors Corporation
30009 Van Dyke Boulevard
Warren, Michigan 48090

SUBJECT: 1983 Hazardous Wastes

Per your request the following is a listing of the hazardous wastes that were generated and disposed of by the Arlington Plant during 1983:

Wastes	Tons
Paint Sludge (D008, F006)	4,413
Kolene Salt Bath Sludge (D002, D007)	198
Waste Paint & Thinner (D001)	187
Waste Paint & Thinner (D001) - Recycled	248
Waste Plastics (D001)	19
TOTAL	5,065

For additional information, please contact D. Tunstall, Sr. Engineer, (Hazardous Waste Coordinator) at 8-853-6350.

J. M. Sherwood
Director
Plant Engineering

By: D. W. Tunstall
Sr. Engineer

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D NUMBER

T/AC

FIOIHIDIGI0I4I2I5I5I4 1 1 Q 19

II. NAME OF INSTALLATION

GMC DELCO PRODUCTS DIVISION KETTERING PLANT

III. INSTALLATION MAILING ADDRESS

PO BOX 1042

Street or P.O. Box

DAYTON OH 45401

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

5200 FERRY BLVD 057

County Code

KETTERING OH 45420 3714

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

KARIEN BEANER 513-258-7621

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year.)

OHD087433744	OHD007776103	WVD000603340	NVD097644801
OHD980681670	OHD075037747	OHD000772723	OHD000816629

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

C. W. Ondrick Plant Manager Dayton Operations C W Ondrick 2/29/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EA 9019

Page 1 of 4

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

TAC

G O H 0 0 0 1 4 2 5 5 4 1 0 2

IX. FACILITY'S EPA I.D. NO.

O H D 0 8 7 4 3 3 7 4 4

X. FACILITY NAME

G E O S C E R

XI. FACILITY'S ADDRESS

5 0 9 2 A B E R D R

Street or P.O. Box

W I L L A M S B U R G 0 4 5 1 7 6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Hazardous waste solid NOS	12	F 0 1 0 1 6	10.75	
2	Sodium cyanide solid	15	F 0 1 1 1 1	7.25	T
3	Waste chromic acid	02	D 0 1 0 1 7	23.83	T
4	Waste perchloroethylene	12	F 0 1 0 1 1	5.5	T
5	Mercury, metallic	15	D 0 1 0 1 9	.25	T
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by item number)

Page 2 of 4

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

Identify facility to which all wastes on this page were sent

VIII. GENERATOR'S EPA I.D. NO.

DIAC

OHD098945219 31

IX. FACILITY'S EPA I.D. NO. X. FACILITY NAME

OHD098945219 31 SOLVENT RECOVERY

XI. FACILITY'S ADDRESS

4301 FAIRMARY ROAD

For P.O. Box

WESTCARROLLTON OH 45449

For Town State Zip Code

XII. WASTE IDENTIFICATION

	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
a.	Waste perchloroethylene	12	F010 11	4215	T
b.	Ignitable waste	01	D001 11	37.75	T
c.	Hazardous waste liquid NOS	12	F010 16	12.5	T
d.					
e.					
f.					
g.					
h.					
i.					
j.					
k.					
l.					
m.					

XIII. COMMENTS (enter information by wast item number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

OHIO04254104

IX. FACILITY'S EPA I.D. NO.

OHQ0811291061 1

X. FACILITY NAME

SYSTECH LIQ TREAT CORP

XI. FACILITY'S ADDRESS

4350 EDGEWAY AVE

Street or P.O. Box

LLWARD OH 43026

City or Town State Zip Code

XII. WASTE IDENTIFICATION

ITEM NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Hazardous Waste Solid NOS	1 2	F 0 0 1 0 1 6	2 2 9	T
2	Hazardous Waste Liquid NOS	1 2	F 0 0 1 0 1 6	2 7 3	T
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by item number)

Page 4 of 4

Do not make

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983

MDD003091972
GM ASSEMBLY DIV
2122 BROENING HWY
BALTIMORE MD 21224

GENERAL INSTRUCTIONS: If you received a preprinted label attached to the mailing envelope in which this form is enclosed, affix it in the space provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If the information is correct and complete, leave blocks 1-15 and 46-50 blank. If you did not receive a preprinted label, complete all sections. REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THE BOOKLET BEFORE COMPLETING THIS FORM. The information requested in this report is required by law (Section 3002 of the Resource Conservation Recovery Act).

Please print/type with one type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T A C

F																									
1	2												13	14	15										

II. NAME OF INSTALLATION

| | | | | | | | | | | | | | | | | | | |

Do not make entries [illegible]

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, [illegible]

Date rec'd: _____ Rec'd by: _____

VII. GENERATOR'S EPA I.D. NO.

M D D 0 0 3 0 9 1 9 7 2 (T/A/C)

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Fondessy Enterprises, Inc.

IX. FACILITY'S EPA I.D. NO.

O H D 0 4 5 2 4 3 7 0 6

X. FACILITY ADDRESS

876 Otter Creek Road
Oregon, Ohio 43616

XI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all transporters whose services were used during 19[illegible]. This section to be completed only once. Do not repeat on supplemental sheets.)

A.C.E.S. OHD 045247905
Delaware Container PAD 064375470
BFI-Chem Services MDD 000 797373
Met Electrical Testing MDD000916382
Chem Waste Mfg. ALD 000622464

XII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Incinerator Ash	15	D 0 0 8	1 0 1 0	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIII. COMMENTS (enter information by section number—see instructions)

There is a descrepancy in identification of the numerical dot hazard class code between the Facilities Report (See Instructions, Page 3) and the Federal Register (see 40 CFR, Part 261, Section XIV-B, Table 1). The Code for hazard class ORM-E as identified in the Facilities Report is "15", and as identified in 40 CFR is "12".

Do not make entries [redacted]

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, **1983**

Date rec'd: _____ Rec'd by: [redacted]

VII. GENERATOR'S EPA I.D. NO.

C|M|D|0|0|3|0|9|2|1|9|7|2|R|U

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

I.U. Conversion Systems, Inc.

IX. FACILITY'S EPA I.D. NO.

P|A|D|9|8|0|5|5|4|8|9|3

X. FACILITY ADDRESS

115 Gibraltar Road
Horsham, Pa. 19044

XI. TRANSPORTATION SERVICES USED (list the name and EPA identification number of all transporters whose services were used during 1983. This section is for transporters only. Do not report on supplemental sheets.)

XII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Incinerator Ash	15	D008	1,41	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIII. COMMENTS (enter information by section number—see instructions)

See Page 2 comment.

Tear out here

Do not write below this line

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VII. GENERATOR'S EPA I.D. NO.

M A C D 0 1 0 3 1 0 1 9 1 1 9 7 2

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chemical Waste Management

IX. FACILITY'S EPA I.D. NO.

A L D 0 0 3 6 2 2 6 4 6

X. FACILITY ADDRESS

P. O. Box 55
Emelle, Alabama 35459

XI. TRANSPORTATION SERVICES USED (list the name and EPA identification number of all transporters whose services were used during 1981. This section is to be considered only yours. Do not report on supplemental sheets.)

XII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Polychlorinated Biphenyls	1 5	M 0 0 1	2,4,4,0,0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIII. COMMENTS (enter information by section number—see instructions)

See Page 2 comment

42-590 1053

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VII. GENERATOR'S EPA I.D. NO.

M D 0 0 3 0 9 1 9 7 2

VIII. FACILITY NAME specify facility to which all wastes on this page were shipped

Het Electrical Testing

IX. FACILITY'S EPA I.D. NO.

M D 0 0 0 9 1 6 3 8 2

X. FACILITY ADDRESS

916 West Patapsco Avenue
Baltimore, Md. 21230

XI. TRANSPORTATION SERVICES USED (list the name and EPA identification number of all transporters whose services were used during 1983. This section is to be completed only once. Do not repeat on supplemental sheets.)

XII. WASTE IDENTIFICATION

Sequence of	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Polychlorinated Biphenyls	1 5	M 0 0 1	9,5,0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIII. COMMENTS (enter information by section number—see instructions)

See page 2 comment

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

TAC

M I D 0 0 7 6 3 8 0 5 8 3 [redacted]
1 2 13 14 15

(OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

C M C I D E T R O I T I A S S E M B L Y P L A N T
30 69

IV. INSTALLATION MAILING ADDRESS

6 0 1 E I g h t e e n t h
15 16 45
Street or P.O. Box

D E T R O I T M I 4 8 2 0 2
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 45
Street or Route number

15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

W O J C I E C H O W S K I W I L L I A M
15 16 45
Name (last and first)

3 1 3 - 5 5 6 - 1 6 3 2
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Wm. C. Wojciechowski	Senior Engineer	[signature]	2-26-84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.
M I D 0 7 6 3 8 0 5 8 3

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
Perto-Chem Processing, Inc.

X. FACILITY'S EPA I.D. NO.
M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS
421 Lycaste
Detroit, Michigan 48214

XII. TRANSPORTATION SERVICES USED

Inland Waters Pollution Control Inc.
4544 Webster
Ecorse, Michigan 48229
MID000820365

Michigan Pumping Services
2619 Superior St.
Trenton, Michigan 48183
MID010871214

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Spent Paint Solvents Containing Toluene	0 8	F 0 0 5	1 1 4 1 2	P
2	Ignitable Spent Solvent Used in Paint Line Cleaning	0 8	D 0 0 1	1 7 4 3 0	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)
XIII. Shipped under DOT 07 Per Table in CFR

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1	2											13	14	15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

16												28

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Source #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Atlas Roof Tar	0 8	D 0 0 1	2 9 7 0	P
	2	Paint Sludge	0 8	D 0 0 1	4 5 1 2	P
	3	Caustic Water-Boothrol LX	0 8	D 0 0 2	1 6 4 7 5	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

XIII. Line item #1 & 2 1983 Generated-Stored on site less than 90 Days as of December 31, 1983.

Line item #3 unused material on hand, no longer required for operations at this location.

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Explain your non-regulated status in the space below.

II. FACILITY EPA I.D. NUMBER

T/A C

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	M	I	D	0	7	6	3	8	0	5	8	3	1	1

This Facility's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other (explain in comment section)

[illegible] SURVEY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

| 30 | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

(1) F O H D 0 4 1 0 6 3 0 7 4 (13-15)

II. NAME OF INSTALLATION

(30) G M - T R U C K & B U S - M O R A I N B A S S E M B L Y P L A N T (67)

III. INSTALLATION MAILING ADDRESS

(15-16) P O - B O X 2 0 (65)

Street or P.O. Box

(15-16) D A Y T O N (41-42) O H (47) 4 5 4 0 1 (51)

City or Town — State — Zip Code

IV. LOCATION OF INSTALLATION

(15-16) 2 6 0 1 W E S T S T R O O P R O A D (65) (47-48) 5 7

Street or P.O. Box — County Code

(15-16) M O R A I N E (41-42) O H (47) 4 5 4 3 9 (51) (53-56) 3 7 1 4

City or Town — State — Zip Code — Primary SIC Code

V. INSTALLATION CONTACT

(15-16) K L O P P E N B U R G D A V I D W (65) (66-77) 5 1 3 - 2 9 7 - 2 3 2 9

Name (last and first) — Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year.)

SOLVENT RESOURCE RECOVERY INC.	OHD 093945293
CHEMICAL WASTE MANAGEMENT	OHD 000724161
CHEMICAL RECOVERY INC.	MID 060975844

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. E. ACOSTA	PLANT MANAGER		3/9/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA 8019B

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO. T/AC

GOD 010 410 610 310 7 4 121

IX. FACILITY'S EPA I.D. NO.

MID 060 975 844

X. FACILITY NAME

CHEMICAL RECOVERY INC

XI. FACILITY'S ADDRESS

3634 5 VAN BORN ROAD

Street or P.O. Box

ROMULUS MI 48174

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	FLAMMABLE LIQUID-WASTE SOLVENT	07	D001 F005	11610920	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by use item number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

OHD 013 945 213

IX. FACILITY'S EPA I.D. NO.

OHD 093 945 213

X. FACILITY NAME

SOLVENT RESOURCE RECOVERY INC

XI. FACILITY'S ADDRESS

613 INFIRMARY ROAD

Street or P.O. Box

WESTCARROLLTON OH 45449

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	FLAMMABLE LIQUID-WASTE SOLVENT	07	D001 F001 F005	16405	P
2	FLAMMABLE LIQUID-WASTE GASOLINE	07	D001	4066	P
3	SPENT CHLORINATED SOLVENT		F002	360	P
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by w... item number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO. T/AC

C O H D 0 1 4 1 1 0 1 6 3 0 7 4 1 2

IX. FACILITY'S EPA I.D. NO.

O H D 0 0 0 7 2 4 1 6 1

X. FACILITY NAME

CHEMICAL WASTE MANAGEMENT

XI. FACILITY'S ADDRESS

3 1 0 6 SNYDER POMEROY ROAD

Street or P.O. Box

SPRINGFIELD OH 45502

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	FLAMMABLE LIQUID-WASTE SOLVENT	07	D001 F003 D015	1944000	P
2	FLAMMABLE LIQUID-WASTE GASOLINE	07	D001	1018010	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information for the corresponding item number)

Page _____ of _____

OhioEPA

January 26, 1984

TO: All Ohio Hazardous Waste Generators Filing 1983 Annual Reports

FROM: Charles J. Wilhelm, Chief, DHMM

SUBJECT: RECYCLING/REDUCTION SURVEY

Purpose of Survey:

A major goal of the Resource Conservation and Recovery Act and the Ohio hazardous waste statute is to encourage as much recycling and reduction of hazardous waste as possible. Recently, waste recycling and reduction have received increased attention as preferred methods to protect the environment, improve business economics and avoid future liability problems. Ohio EPA requests that you complete the following survey questions so that we may better determine the extent of present recycling/reduction and planned future efforts, in addition to obtaining your opinions on this topic.

Survey results will be available in mid-1984, but will not refer to individual companies by name.

Please complete the following and return it along with your "GENERATOR ANNUAL REPORT" for 1983. Send it to:

Ohio EPA
Attention: Annual Reports
Division of Hazardous Materials Management
P.O. Box 1049
Columbus, OH 43216-1049

All questions concerning this survey should be addressed to Anthony Sasson, (614) 462-8971, or Tom Carlisle, (614) 462-8975.

REDUCTION/RECYCLING SURVEY

Facility name GM TRUCK & BUS - MORAINE ASSY. PLANT U.S. EPA I.D.# OHD 041063074

Facility contact DAVID V. KLOPPENBURG Telephone #(513) 297-2329

1. During 1983, did your facility recycle or reuse any material that was or would have been classified as a hazardous waste?

X YES ____ NO

2. During 1983, did you recycle these materials at your own facility or did a commercial recycler handle all or part of this material?

_____ Recycled at own facility __X__ All or part handled by commercial recycler

3. Do you have established plans to recycle a higher percentage of this material in 1984 or the near future?

_____YES __X__NO _____Probable after 1984 _____Not likely in the near future

4. "Waste reduction" means that smaller amounts of hazardous waste are generated by implementing process changes, segregating wastes, substituting end-products, or improving process controls. During 1983, were you able to reduce the amount of waste generated by using one of these practices? (This does not include recycling or waste concentration).

_____YES __X__NO

5. In 1984, do you plan to implement any waste reduction methods at your facility?

_____YES __X__NO _____Probable after 1984 _____Not likely in the near future

6. Do you have a need for more technical information (from a consultant, trade organization or other source) concerning waste recycling and/or reduction?

_____YES __X__NO

7. Do you feel there is a need for more off-site commercial recycling facilities or capacity in your area?

_____YES __X__NO

8. Which of the following do you feel has the greatest negative effect on hazardous waste recycling or reduction?

__X__Regulatory requirements _____Economic conditions/ equipment Costs _____Lack of Technical information/ feasibility

9. Have you considered using the services of the Northeast Industrial Waste Exchange and its Listings Catalog but rejected the idea?

_____YES __X__NO If yes, why?_____

_____

_____

10. Would you like to continue to receive the NIWE Listings Catalog?

__X__YES _____NO If no, why?_____

_____

_____

Other comments:

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1	Non-handler
2	Small Quantity Generator
4	Exempt
(8)	Beneficial Use
9	Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☒ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

(F M 1 D 0 0 1 8 0 7 5 8 5 7)

III. NAME OF INSTALLATION

GMC DETROIT TRUCK CENTER

IV. INSTALLATION MAILING ADDRESS

3570 WYOMING

Street or P.O. Box

DEARBORN MI 48126

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

Street or Route number

City or Town State Zip Code

VI. INSTALLATION CONTACT

DENNIS P BREEN

Name (last and first)

(313) 565-7155

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Dennis P. Breen Mgr/Service 12-31

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Do not make entries in shaded areas

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
(5) Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

M I D 0 0 1 8 0 7 5 8 5 1

This Installation's Non-Regulated Status is Expected to Apply:

☒ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

G M C DETROIT TRUCK CENTER

IV. INSTALLATION MAILING ADDRESS

3570 WYOMING

Street or P.O. Box

DEARBORN MI 48126

City or Town State Zip Code

Tear out here

V. LOCATION OF INSTALLATION (if different than section IV above)

Street or Route number

City or Town State Zip Code

VI. INSTALLATION CONTACT

DENNIS P BREEN

Name (last and first)

313-575-7151

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Dennis P. Breen Mgr/Service 1-27-84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A/B (Revised 1/84)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31 1983
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
(2) Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☑ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T/A C

MID044192613 6101 (1 2 13 14 15)

III. NAME OF INSTALLATION

GMC TRUCK VIEWTEC POINTIAC (30 69)

IV. INSTALLATION MAILING ADDRESS

6775 OAKLAND AVE (15 16 45)
Street or P.O. Box

POINTIAC MI 48055 (15 16 41 42 47 51)
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(15 16 45)
Street or Route number

(15 16 41 42 47 51)
City or Town State Zip Code

VI. INSTALLATION CONTACT

O'NEILL WILLIAM M (15 16 45)
Name (last and first)

313-456-4964 (44 55)
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

D G BROWER MGR 1/16/84
Print/Type Name Title Signature of Authorized Representative Date Signed

Page 1 of

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

16 28

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Item No.	A. Description of Waste	B. Non-Hazardous Waste	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	If Hold on Advance
1			35 38 39 42		
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Page ____ of ____

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

MID980568613 (T)

1 2 13 14 15

* C383 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

GM TRUCK & BUS GROUP
PONTIAC WEST ASSEMBLY PLANT

30 69

IV. INSTALLATION MAILING ADDRESS

331 JUDSON STREET

15 16 45

Street or P.O. Box

PONTIAC MI 48053

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5600 SOUTH SAGINAW STREET

15 16 45

Street or Route number

PONTIAC MI 48053

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

WARD RICHARD E

15 16 45

Name (last and first)

313-456-3283

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

ROBERT D. LEE, PLANT MANAGER — Robert D. Lee — 2/27/84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13 A/B (6-80) (Revised 11-83)

Please do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

IX. FACILITY'S EPA I.D. NO.

MIDO98056883 (11)

X. GENERATOR'S EPA I.D. NO.

MIDO05356902

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

GM TRUCK & BUS GROUP
PONTIAC CENTRAL & EAST PLANTS ON-SITE ☐

XII. GENERATOR ADDRESS

660 SOUTH BLVD. EAST
PONTIAC, MI. 48053

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM
S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
	1	METHYLENE CHLORIDE FROM FIBERGLASS OPERATION	U080F002	S02	8	T
	2	PURGE & PAINT REDUCING SOLVENT; MIXTURE XYLENE & MEK	F003F005	S02	5	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I D 9 8 0 5 6 8 8 3 6 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

GM TRUCK & BUS GROUP
PONTIAC CENTRAL & EAST PLANTS

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 5 3 5 6 9 0 2

XI. FACILITY ADDRESS

660 SOUTH BLVD. E.
PONTIAC, MI. 48053

XII. TRANSPORTATION SERVICES USED

INLAND WATERS POLLUTION CONTROL	M I D 0 0 0 8 2 0 3 6 5
PONTIAC CENTRAL & EAST PLANTS	M I D 0 0 5 3 5 6 9 0 2

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	PAINT & PHOSPHATE SLUDGE MIXTURE	15	F006 F019	14.47	T
	2	PAINT & PURGE & REDUCING SOLVENT: MIXTURE MEK & XYLENE	08	F003 F005	5.8	T
	3	METHYLENE CHLORIDE FROM FIBERGLASS OPERATION	13	U080 F002	7	T
	4	PURGE & PAINT REDUCING SOLVENT: MIXTURE XYLENE & MEK	08	F003 F005	.5	T
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

XIII. Line # 1 B. SHIPPED UNDER DOT CODE 12 PER CFR TABLE.
Line # 2 B. SHIPPED UNDER DOT CODE 07 PER CFR TABLE.
Line # 3 B. SHIPPED WITH DOT CODE BLANK, NO ORM-A CODE IN CFR TABLE.
Line # 4 B. SHIPPED UNDER DOT CODE 07 PER CFR TABLE.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 9 8 0 5 6 8 8 3 6

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEMICAL RECOVERY SYSTEMS

X. FACILITY'S EPA I.D. NO.

M I D 0 0 6 0 9 7 5 8 4 4

XI. FACILITY ADDRESS

36345 VAN BORN RD.
ROMULUS, MI. 48174

XII. TRANSPORTATION SERVICES USED

CHEMICAL RECOVERY SYSTEMS M I D 0 6 0 9 7 5 8 4 4

INLAND WATERS POLLUTION CONTROL M I D 0 0 0 8 2 0 3 6 5

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	PURGE & PAINT REDUCING SOLVENT MIXTURE XYLENE & MEK	0 8	F 0 0 3 F 0 0 5	2 4 7	T
2	METHYLENE CHLORIDE FROM FIBERGLASS OPERATION	1 3	U 0 8 0 F 0 0 2	1 2	T
3	1, 1, 1, TRICHLOROETHANE	1 3	U 2 2 6 F 0 0 2	3	T
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

XIII. LINE #1 B. SHIPPED UNDER DOT CODE 07 PER CRF TABLE.

LINE 2 & 3 B. SHIPPED WITH DOT CODE BLANK, NO ORM-A CODE IN CFR TABLE.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 9 8 0 5 6 8 8 3 6 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

McKESSON ENVIROSYSTEMS

X. FACILITY'S EPA I.D. NO.

F K Y D 0 5 3 3 4 8 1 0 8

XI. FACILITY ADDRESS

BOX 406
STATE HIGHWAY 146
NEW CASTLE, KY. 40050

XII. TRANSPORTATION SERVICES USED

INLAND WATERS POLLUTION CONTROL M I D 0 0 0 8 2 0 3 6 5

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
22 32	1	PURGE & PAINT REDUCING SOLVENT; MIXTURE XYLENE & MEK	0 8 (31 34)	F 0 0 3 (35 38) F 0 0 5 (39 42)	4 7 (51 59)	T (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

XIII. LINE 1 B. SHIPPED UNDER DOT CODE 07 PER CFR TABLE.

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print or type (12 characters per inch).

This Installation's Non-Regulated Status is Expected to Apply

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

MIDO053562

III. NAME OF INSTALLATION

GM TRUCK & BUS GROUP

PONTIAC CENTRAL & EAST PLANTS

IV. INSTALLATION MAILING ADDRESS

331 JUDSON STREET

Street or P.O. Box

PONTIAC MI 48058

City or Town State Zip Code

V. LOCATION OF INSTALLATION (If different than section IV above)

5600 SOUTH BOULEVARD EAST

Street or Route Number

PONTIAC MI 48053

City or Town State Zip Code

VI. INSTALLATION CONTACT

MILLWARD WILLIAM D

Name (last and first)

313-456-3543

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

ROBERT J. PERRY PLANT MANAGER Robert J Perry 2/21/84

Print or Type Name Title Signature of Authorized Representative Date Signed

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 9 0 2 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL # 2

X. FACILITY'S EPA I.D. NO.

M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 I. SERVICE DR.
BELLEVILLE, MI 48111

XII. TRANSPORTATION SERVICES USED

INDUSTRIAL WASTE TRANSPORTATION, INC. MIT 473012529

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. Out of Waste	C. EPA Hazardous Waste No. (specify subcategory)	D. Amount of Waste	E. Unit of Measure
1	MIXED WASTE WATER TREATMENT SLUDGES PAINT & PHOSPHATING SLUDGES	1	F 0 0 5 F 0 0 1	5 4 7 0	T
2	PAINT & PHOSPHATING SLUDGES (MIXED WITH THE ABOVE)	1	F 0 0 1 F 0 0 5	1 4 4 7	T
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number - see instructions)

XIII - 1-B, 2-B, - SHIPPED UNDER DOT CODE 12 PER CFR TABLE

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

N I D 0 0 5 3 5 6 9 0 2 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SYSTECH CORPORATION

X. FACILITY'S EPA I.D. NO.

[redacted] O H D 0 0 5 0 4 8 9 4 7

XI. FACILITY ADDRESS

COUNTY ROAD 176
BOX 266
PAULDING, OH 45879

XII. TRANSPORTATION SERVICES USED

INLAND WATERS POLLUTION CONTROL, INC. MID 000820365

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	Unit of Measure
1	SCRAP PAINT REDUCED OR PURGED WITH A XYLENE AT 10% DILUTE	0 8	F 0 0 3 F 0 0 5	1 7 7	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

XIII - 1-B, - SHIPPED UNDER DOT CODE 07 PER CFR TABLE

...ENVIRONMENTAL PROTECTION AGENCY

...for 1983

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 9 0 1 2 [redacted]

TRICIL LIMITED

X. FACILITY'S EPA I.D. NO.

M I T 2 7 0 0 1 9 9 0 4

XI. FACILITY ADDRESS

R.R. #1, P.O. BOX 786
CORUNNA, ONTARIO, CANADA N0M 1J0

XII. TRANSPORTATION SERVICES USED

INLAND WATERS POLLUTION CONTROL, INC. MID 000820365

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	SCRAP PAINT REDUCED OR PURGED WITH XYLENE AND MEK MIXTURE	0 8	F 0 0 3 F 0 0 5	2 4	T

XIV. COMMENTS (enter information by section number—see instructions)

XIII - 1-B, - SHIPPED UNDER DOT CODE 07 PER CFR TABLE

ENVIRONMENTAL PROTECTION AGENCY

Chemical Hazardous Waste

I. EPA I.D. NO.

M I D 0 1 0 5 3 5 6 9 0 2 [redacted]

CHEMICAL RECOVERY SYSTEMS, INC.

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 6 0 9 7 5 8 4 4

XI. FACILITY ADDRESS
36345 VAN BORN ROAD
ROMULUS, MI 48174

XII. TRANSPORTATION SERVICES USED

CHEMICAL RECOVERY SYSTEMS, INC. MID 060975844

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. Total Quantity	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	PURGE OR REDUCING SOLVENT; MIXTURE MEK AND XYLENE	0 8	F 0 0 3 F 0 0 5	1 3 6	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number--see instructions)

XIII - 1-B, - SHIPPED UNDER DOT CODE 07 PER CFR TABLE

...Biennial Hazardous Waste ... for 1983 (cont.)

VII. GENERATOR'S EPA I.D. NO.

T/A C.
[redacted] M I D 0 0 5 3 5 6 9 0 1 2 [redacted]
1 2 13 14 15

MC KESSON ENVIROSYSTEMS

X. FACILITY'S EPA I.D. NO.

[redacted] K Y D 0 5 3 3 4 8 1 0 8
16 28

XI. FACILITY ADDRESS

BOX 406, STATE HIGHWAY 146
NEW CASTLE, KY 40050

XII. TRANSPORTATION SERVICES USED

INLAND WATERS POLLUTION CONTROL, INC. MID 000820365

XIII. WASTE IDENTIFICATION

A. Line #	B. Description of Waste	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	PURGE OR REUSED SOLVENT; MIXTURE MEK AND XYLENE	0 3 P 0 0 3 F 0 0 5	2 0	T
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				

XIV. COMMENTS (enter information by section number—see instructions)

XIII - 1-B, - SHIPPED UNDER DOT CODE 07 PER CFR TABLE

ENVIRONMENTAL PROTECTION AGENCY

Hazardous Waste Manifest for 1983

VIII. GENERATOR'S EPA I.D. NO.

MIDO05356902 T4A C

IX. FACILITY NAME (Specify facility to which this page was shipped)

GM TRUCK & BUS GROUP
PONTIAC WEST ASSEMBLY PLANTS

X. FACILITY'S EPA I.D. NO.

MID980568836

XI. FACILITY ADDRESS

600 SOUTH SAGINAW STREET
PONTIAC, MI 48053

XII. TRANSPORTATION SERVICES USED

INLAND WATERS POLLUTION CONTROL, INC. MID 000820365

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No.	D. Amount of Waste	E. Unit of Measure
22	PURGE & PAINT REDUCING SOLVENT; MIXTURE MEK AND XYLENE	0 3	F 0 0 3 F 0 0 5	0 5	T
	METHYLENE CHLORIDE FROM FIBER GLASS OPERATION	1 3	F 0 0 2	0 8	T

XIV. COMMENTS (enter information by section number - see instructions)

XIII - 1-B, - SHIPPED UNDER DOT CODE 07 PER CFR TABLE
2-B, - SHIPPED WITH DOT BLANK, NO ORM-A CODE IN CFR TABLE

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

Generator Report 1983 CFD Massena

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 5

(1) ☒ GENERATOR EPA ID NUMBER N Y D 0 1 2 8 7 1 4 8 9 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME CENTRAL FOUNDRY DIVISION, GMC
STREET ROOSEVELTOWN HIGHWAY
CITY MASSENA STATE NY ZIP CODE 13662

(2) ☐ TRANSPORTER EPA ID NUMBER _____ NYSDEC Part 364 Permit No. _____
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER N Y D 0 8 0 3 3 6 2 4 1 NYSDEC Facility I.D. No. 9 2 2 0 2 1
NAME CECOS International
STREET 56th St. and Pine Ave.
CITY Niagara Falls STATE NY ZIP CODE 14302

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-SITE
WASTE POLYCHLORINATED BIPHENYLS	B 0 0 5	0 2	D 8 1	1 1 0 9 7 0	0 3	0 2
EMPTY DRUMS						
HAZARDOUS WASTE SOLID N.O.S.	F 0 0 1	0 2	D 8 1	8 8 0 3 0	0 3	0 2
WASTE SULFURIC ACID	D 0 0 2	0 1	1 2 9	8 1 0 1	0 2	
WASTE CAUSTIC SOLUTION	D 0 0 2	0 1	0 8 1	6 0 0 0 1	0 2	
WASTE ISOPROPYL ALCOHOL	D 0 0 1	0 1	S 0 1	2 0 0 0 1	0 2	
WASTE POLYCHLORINATED BIPHENYLS SOLIDS	B 0 0 5	0 2	D 8 1	1 1 8 0 7	0 3	0 2

I hereby affirm under penalty of perjury that information given on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to § 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME ALAN K. STEFFE TITLE PLANT MANAGER
SIGNATURE A. K. Steffe DATE 2/1/84

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 5

GENERATOR EPA ID NUMBER N Y D 0 1 2 8 7 1 4 8 9 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

CENTRAL FOUNDRY DIVISION, GMC

ROOSEVELTOWN HIGHWAY

MASSENA | STATE NY | ZIP CODE 13662

☐ TRANSPORTER EPA ID NUMBER | NYSDEC Part 364 Permit No.

NAME

STREET

CITY | STATE | ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER I N D 0 0 6 0 3 6 0 9 9 | NYSDEC Facility I.D. No.

NAME CENTRAL FOUNDRY DIVISION

STREET N. JACKSON STREET

CITY BEDFORD | STATE INDIANA | ZIP CODE 47421

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
WASTE FOUNDRY MOLD BY-PRODUCTS	8 0 0 9	0 1	S 0 2	1 8 5 0 8 0 0	0 3	2

I hereby attest under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME ALAN K. STEFFE | TITLE PLANT MANAGER

SIGNATURE Alan K. Steffe | DATE 2-11-84

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 3 of 5

☒ GENERATOR EPA ID NUMBER N,Y,0,0,1,2,8,7,1,4,8,9 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME CENTRAL FOUNDRY DIVISION, GMC

STREET ROOSEVELTOWN HIGHWAY

CITY MASSENA | STATE NY | ZIP CODE 13662

(2) ☐ TRANSPORTER EPA ID NUMBER | | | | | | | | | | | | NYSDEC Part 364 Permit No. | | | – | | | |

NAME

STREET

CITY | STATE | ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER A,L,0,0,0,0,6,2,2,4,6,4 NYSDEC Facility I.D. No. | | | | |

NAME CHEMICAL WASTE MANAGEMENT

STREET

CITY EMELLE | STATE ALABAMA | ZIP CODE 35459

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
WASTE POLYCHLORINATED BIPHENYL	0 0 0 9 0 1	0 8 1	3 1 6 5 1 0 0 3	0 2		

I hereby attest under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME ALAN K. STEFFE | TITLE PLANT MANAGER

SIGNATURE Alan K. Steffe | DATE 2-11-84

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 4 of 5

(2) ☒ GENERATOR EPA ID NUMBER N Y D 0 1 2 8 7 1 4 8 9 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME CENTRAL FOUNDRY DIVISION, GMC
STREET ROOSEVELTOWN HIGHWAY
CITY MASSENA STATE NY ZIP CODE 13662

(3) ☐ TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER N Y D 0 3 0 4 8 5 2 8 8 NYSDEC Facility I.D. No.
NAME REVERE SMELTING AND REFINING
STREET BALLARD ROAD, RT. 2
CITY MIDDLETOWN STATE NY ZIP CODE 10940

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
WASTE BATTERIES	0 0 0 2	0 2	T 1 8	1 4 7 7 4 0	0 3	0 ?

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME ALAN K. STEFFE TITLE PLANT MANAGER
SIGNATURE Alan K. Steffe DATE 6-11-84

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 5 of 5

(3) ☒ GENERATOR EPA ID NUMBER NYD 012 871 488 9 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

(4) NAME CENTRAL FOUNDRY DIVISION, GMC

(4) STREET ROOSEVELTOWN HIGHWAY

(4) CITY MASSENA STATE NY ZIP CODE 13662

(5) ☐ TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.

NAME

STREET

CITY STATE ZIP CODE

(6) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER OHD 018 743 174 NYSDEC Facility I.D. No.

NAME CECOS Of Ohio

STREET 4879 SPRING GROVE AVENUE

CITY CINCINNATTI STATE OHIO ZIP CODE 45232

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-SITE
WASTE POLYCHLORINATED BIPHENYL (SLUDGE)	B00	502	T34	37012	01	
WASTE POLYCHLORINATED BIPHENYL (SLUDGE)	B00	502	S01	11524	02	

I hereby affirm under penalty of perjury that information contained on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME ALAN K. STEFFE TITLE PLANT MANAGER

SIGNATURE Alan K. Steffe DATE 6-11-84

Do not make entries in shaded areas. OMB #: 2050-0024 Expires 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

T A C

M I D 0 5 3 5 6 6 9 6

This Installation's Non-Regulated Status is Expected to Apply:

■ For 1983 Only ☐ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GM - CENTRAL FOUNDRY - SAG . MAIL LEAB BL... IRON

IV. INSTALLATION MAILING ADDRESS

77 W. CENTER STREET

Street or P.O. Box

SAGINAW MI 48605

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

Street or Route number

City or Town State Zip Code

VI. INSTALLATION CONTACT

MC INNIS DAVID E

Name (last and first)

517-776-3144

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. E. Wheeler Plant Manager 1/31/84

Print/Type Name Title Signature of Authorized Representative Date Signed

Page 1 of ____

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I T I D 0 1 0 5 3 5 6 6 9 6 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

McKesson Envirosystem, Inc.

X. FACILITY'S EPA I.D. NO.

K Y D 0 5 3 3 4 8 1 0 8

XI. FACILITY ADDRESS

State Hwy. #146, P. O. Box 406
New Castle, KT 40050

XII. TRANSPORTATION SERVICES USED

McKesson Chemical Company
27001 Trotley Industrial Drive
Taylor, MI 48180 MID010861524

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste 1-,1-,1-Trichloro-ethane	1 5	P 0 0 1	0 0 0 0 0 5 7 2	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Waste Chlorinated Solvent-Reclaimed

Page ____ of ____

Tear out here

20 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT 20

This report is for the calendar year ending December 31, 1983.

FOR AGENCY USE ONLY

FOR AGENCY USE [L|P|H|W|C] (1–5) CARD TYPE [2|0] (6–7) TRANS CODE [A] (8) DATE ENTERED [ ]/[ ]/[ ] (9–14)

GENERAL INSTRUCTIONS

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.
The information requested in this report is required by Federal and State law.

Please print/type with elite type (12 characters per inch)

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the calendar year covered by this report. Circle the one numeric code (1 thru 5) that best describes your status during the entire year (see instructions for explanation of codes), and explain in Comment Section.

[1] (15) Non-handler
[2] (15) Small Quantity Generator
[3] (15) Exempt
[4] (15) Beneficial Use
[5] (15) Closed

This installation's Non-Regulated Status is expected to apply:

[6] (16) For 1983 only, explain in Comment Section.
[7] (16) Permanently, explain in Comment Section.
[8] (16) Other, explain in Comment Section.

II. REGULATED STATUS

See instructions for completing this and following sections.

III. GENERATOR'S USEPA I.D. NUMBER (17–28): I L D 0 0 5 1 4 1 5 5 1

IV. GENERATOR'S ILLINOIS I.D. NUMBER (29–39): 1 8 3 0 9 0 0 0 0 1 G

V. NAME OF INSTALLATION

Central Foundry Division, General Motors Corporation

VI. INSTALLATION MAILING ADDRESS

P.O. Box 592
Street or P.O. Box

Danville IL 61832
City or Town State Zip Code

VII. LOCATION OF INSTALLATION (if different than section VI above)

I-74 at "G" Street
Street or Route number

Danville, IL 61832
City or Town State Zip Code

VIII. INSTALLATION CONTACT

Larson, Roy F. - Environmental Coordinator
Name (last and first)

217-431-9367
Phone No. (area code & no.)

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111-1/2, Sections 1004 and 1021 (b)(2). Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues, a fine up to $1,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

F. M. McCurdy, Plant Manager — 2-29-84
Print Type Name Title Authorized Representative Date Signed

Leon S. Wieland, General Superintendent

Page [0|0|1] (41–43) of 3

X

Central Foundry Div. of GM
P. O. Box 592
Danville, IL 61832
Attn: Roy Larson
Plant Eng. Dept.
ILD 005 141 551 183 090 0001G

50 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 50

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983 (cont.)

FOR AGENCY USE ONLY

FOR AGENCY USE (L|P|H|W|C) (1–5) CARD TYPE (5|0) (6–7) TRANS CODE (A) (8) DATE ENTERED (9–14)

X. GENERATOR'S USEPA I.D. NO. (18–29): I L D 0 0 5 1 4 1 5 5 1

XI. GENERATOR'S ILLINOIS EPA I.D. NO. (30–40): 1 8 3 0 9 0 0 0 0 1 G

XII. FACILITY'S USEPA I.D. NO. (41–52): A L D 0 0 0 6 2 2 4 6 4

XIII. FACILITY'S ILLINOIS EPA I.D. NO. (53–60):

XIV. FACILITY'S NAME / ADDRESS

Name: Chemical Waste Management, Emelle Facility — Phone: 205 652-9531

P.O. Box 55 (Street P.O. Box) — Emelle (City) — AL (State) — 35459 (Zip)

XV. WASTE IDENTIFICATION

A. LINE NO. (61–64)	B. DESCRIPTION OF WASTE	UNIT OF MEASURE (65–66)	D. RCRA HAZARDOUS WASTE NO. (see instructions) (67–82)	E. AMOUNT OF WASTE (gallons only) (83–91)	F. DENSITY (lbs. / gal.) (92–94)
0 0 0 1	Corrosive liquid from cold box core process exhaust scrubbers, TETN slurry	0 2	D 0 0 2	1 0 1 2 0	9 . 3
0 0 0 2	Ignitable liquid unused in process and contaminated, Triethylamine waste	0 8	D 0 0 1	1 5 9 5	9 . 3
0 0 0 3					.
0 0 0 4					.
0 0 0 5					.
0 0 0 6					.
0 0 0 7					.
0 0 0 8					.
0 0 0 9					.
0 0 1 0					.

XVII. PAGE NUMBER (71–72): 0 0 2

X

60

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

60

This report is for calendar year ending December 31, 1983 (cont.)

FOR AGENCY USE ONLY

FOR AGENCY USE [L|P|H|W|C] (1–5) CARD TYPE [6|0] (6–7) TRANS CODE [A] (8) DATE ENTERED [ ]/[ ]/[ ] (9–14)

X. GENERATOR'S USEPA I.D. NO. (10–29)

[I|L|D|0|0|5|1|4|1|5|5|1]

XI. GENERATOR'S ILLINOIS EPA I.D. NO. (30–40)

[1|8|3|0|9|0|0|0|1|G]

V./VI. GENERATOR'S NAME/ADDRESS

Name: Central Foundry Division, General Motors Corporation Phone: 217|431-0367

P.O. Box 592 (Street (P.O. Box)) Danville (City) IL (State) 61832 (Zip)

XVIII. LIST OF TRANSPORTATION SERVICES (HAULERS) USED:

A. LINE NO. (41–44)	B. TRANSPORTER'S NAME / ADDRESS	C. TRANSPORTER'S USEPA I.D. NO. (45–56)	D. TRANSPORTER'S ILLINOIS EPA I.D. NO. (57–60)
0|0|0|1	Ashland Chemical, Elm Street, Argenta, IL 62501	I|L|D|0|5|9|9|4|2|0|8|6	1|0|6|5
0|0|0|2	C.I.D., Box 1306, 1038 and Calumet City Exp. Calumet City, IL 60409	I|L|D|0|1|0|2|8|4|2|4|8	0|0|7|5

Do not make entries in shaded areas

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

F M I D 0 4 1 7 9 3 3 4 0 1 1

III. NAME OF INSTALLATION

C E N T R A L F O U N D R Y D I V . G M C

IV. INSTALLATION MAILING ADDRESS

3 2 1 0 0 V E T E R A N S M E M O R I A L P A R K W A Y

Street or P.O. Box

4 S A G I N A W | M I | 4 8 6 0 1

City or Town | State | Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5

Street or Route Number

6

City or Town | State | Zip Code

VI. INSTALLATION CONTACT

7 F I N D L A Y J A C K

Name (last and first)

8 5 1 7 - 7 7 6 - 2 4 6 1

Phone No. (area code & no.)

VII. CERTIFICATION

D. C. Johnson, Plant Manager

9 Print/Type Name | Signature of Authorized Representative | Date (mo., day, yr.)

EPA Form 8700-13A/(5-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: [redacted] Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 4 1 7 9 3 3 4 0 (FAC 11)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Central Foundry Division - GMC
Saginaw Nodular Iron Plant

X. FACILITY'S EPA I.D. NO.

F M I D 0 4 1 7 9 3 3 4 0

XI. FACILITY ADDRESS

On-Site

XII. TRANSPORTATION SERVICES USED

Central Foundry Trucks

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. Did it contain hazardous waste?	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Calcium Carbide Slag Resulting from iron desulfurization process		D 0 0 3	1 4 2 0 6 2 5.7	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Line 1. T-34, Water Treatment of slag reacting any unreacted calcium carbide, thus rendering the slag non-hazardous.

K

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 4 1 7 9 3 3 4 0

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

U. S. Chemical Co., Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 6 5 2 3 3 8 5

XI. FACILITY ADDRESS

29163 Callahan
Roseville, MI. 48066

XII. TRANSPORTATION SERVICES USED

U. S. Chemical Co., Inc. MID 006523385

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (Not Hazardous Waste)	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	1,1,1 Trichlorothane	1 3	F 0 0 1	2 1 8 4 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I 0 0 4 1 7 9 3 3 4 0

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

U. S. Chemical Co., Inc.

X. FACILITY'S EPA I.D. NO.

XI. FACILITY ADDRESS

29163 Callahan
Roseville, MI. 48066

XII. TRANSPORTATION SERVICES USED

U. S. Chemical Co., Inc. MID 006523385

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (DOT) Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Paint and Solvent (Thinner) Residue	0 1	D 0 0 1	3 0 0 3	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS enter information by section number—see instructions)

X [redacted]

Page 1 of 5

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 4 1 7 9 3 3 4 0 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met Services, Inc.

X. FACILITY'S EPA I.D. NO.

M I D 0 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, MI. 48192

XII. TRANSPORTATION SERVICES USED

A-1 Disposal Corporation MID 059695452

XIII. WASTE IDENTIFICATION

Sequence No.	A. Description of Waste	B. (DOT) Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Sodium Hydroxide Solution	0 2	D 0 0 2	3 3 0 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE of INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 0 | 3 | 6 | 0 | 9 | 9 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

OHD 087433744

X. FACILITY'S NAME (specify)

| C | E | C | O | S | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

FACILITY'S EPA ID NUMBER | O | H | D | 0 | 0 | 4 | 8 | 1 | 6 | 6 | 2 | 9 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 5 | 0 | 9 | 2 | | A | B | E | N | | R | O | A | D | | | | | | | | | | | | | | | | | | | |

City or Town | W | I | L | L | I | A | M | S | B | U | R | G | | | | | | | | | | State | O | H | Zip | 4 | 5 | 1 | 7 | 6 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Potassium Cyanate	1 8	F 0 1 1 4	2 1 . 2 5	P T (T)
2	Sodium Hydroxide Solids	0 2	D 0 0 2	4 . 5 0	P T (T)
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

F/AC

(F|O|H|0|0|5|0|5|0|2|7|3| |1|)
1 2 13 14 15

II. NAME OF INSTALLATION

(C|E|N|T|R|A|L| |F|O|U|N|D|R|Y| |D|I|V| |I|S|I|O|N| |G|M|C| | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

for the calendar year ending December 31 19 83

FACILITY INFORMATION

(Identify the duty to which all entries on this page refer)

VIII. GENERATOR'S EPA I.D. NO.

OHIO5027312

IX. FACILITY'S EPA I.D. NO.

MID980615298

X. FACILITY NAME

PETROCHEM

XI. FACILITY'S ADDRESS

4211 LYLASTE

Street or P.O. Box

DETROIT MI 48214

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste Mixed Solvents N.O.S.	07	D001	74125	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by line number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31 19 83

FACILITY INFORMATION

Report only for the facility to which all wastes on this page were sent.

VIII. GENERATOR'S EPA I.D. NO.

TAC

OHD055092773 (1–12, 13–14, 15)

IX. FACILITY'S EPA I.D. NO.

MID099699194 (16–27)

X. FACILITY NAME

CHEM-METT SERVICES INC (28–59)

XI. FACILITY'S ADDRESS

1850 ALLEN ROAD (20)

Street or P.O. Box

WYANDOTTE MI 48192 (28)

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Mixed Waste Oil, Water & Solvent N.O.S.	07	D001	8484	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

K

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31 of 83

FACILITY INFORMATION

(Specify for any information on all sections on this page more than once)

VIII. GENERATOR'S EPA I.D. NO.

OHD005509273

IX. FACILITY'S EPA I.D. NO.

OHT400001241 5

X. FACILITY NAME

SMITH ALLEN

XI. FACILITY'S ADDRESS

3903 STITICKNEY

Street or P.O. Box

TOLEDO OH 43608

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	1-1-1 Trichloroethane Degreasing Sludge	1 2	F001	13620	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by line number)

Page ___ of ___

Do not make entries in shaded areas

OMB No. 2050-0024 Expires 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Explain your non-regulated status in the space below.

Annual Report TSDF 1983

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

NYD012871489 (TAC 1)

This Facility's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other (explain in comment section)

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

CENTRAL FOUNDRY DIVISION MASSENA PLANT

IV. FACILITY MAILING ADDRESS

PO BOX 460

Street or P.O. Box

MASSENA NY 13662

City or Town State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

ROOSEVELTOWN HIGHWAY

Street or Route number

MASSENA NY 13662

City or Town State Zip Code

VI. FACILITY CONTACT

FAYETTE DAVID

Name (last and first)

315-764-2000

Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

A. Cost Estimate for Facility Closure: $ 14,000

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only): $

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

ALAN K. STEFFE — Print or Type Name

PLANT MANAGER — Title

Alan K. Steffe — Signature of Authorized Representative

2-11-84 — Date Signed

EPA Form 8700-13B(5-80) (Revised 11-82)

Tear on here

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

IX. FACILITY'S EPA I.D. NO.

N Y D 0 1 2 8 7 1 4 8 9

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

ON-SITE ☐

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

N Y D 0 1 2 8 7 1 4 8 9

XIII. TOTAL WASTE ON STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE 6 6 9 8 0 UOM P | S02 AMOUNT OF WASTE | UOM | S03 AMOUNT OF WASTE | UOM

S04 AMOUNT OF WASTE | UOM | S05 AMOUNT OF WASTE 3 4 5 0 UOM P

XIV. WASTE IDENTIFICATION

	A. Description of Waste	B. EPA Hazardous Waste No. (enter if known)	C. Hazardous Waste Method	D. Amount of Waste	E. Unit of Measure
1	WASTE SOLID AS GENERATED FROM HALOGENATED SOLVENT DEGREASING OPERATIONS	F 0 0 1	S 0 1	8 8 0 3 0	P
2	WASTE SULFURIC ACID	D 0 0 2	S 0 1	8 1	G
3	CORROSIVE WASTE-SPENT RESIDUE FROM SODIUM HYDROXIDE BATH	D 0 0 2	S 0 1	7 9 4 0	P
4	WASTE ISOPROPYL ALCOHOL	D 0 0 1	S 0 1	2 0 0	G
5	WASTE BATTERIES-DEAD FORK TRUCK BATTERIES	D 0 0 2 D 0 0 8	S 0 1	5 5 0 4 0	P
6	WASTE SOLID-POLYCHLORINATED BIPHENYL - EMPTY DRUMS	B 0 0 5	S 0 1	1 1 0 9 7 0	P
7	HYDRAULIC FLUID-WASTE POLYCHLORINATED BIPHENYL	B 0 0 9	S 0 2	1 8 5 0 8 0	P
8	DIGESTER SLUDGE-WASTE POLYCHLORINATED BIPHENYL	B 0 0 9	S 0 1	3 1 6 6 1 0	P
9	WASTE POLYCHLORINATED BIPHENYL SLUDGE	B 0 0 5	S 0 1	4 8 5 3 6 0	P
10	WASTE POLYCHLORINATED BIPHENYL SOLID	B 0 0 5	S 0 1	1 1 8 6 8 0	P
11	WASTE POLYCHLORINATED BIPHENYL MIXTURE	B 0 0 9	S 0 1	6 6 6 2 0	P
12	WASTE SULFURIC ACID MIXTURE FROM LAB USE	D 0 0 2	S 0 1	3 6 0	P

XV. COMMENTS (enter information by section number-see instructions)

Line #2 density of sulfuric acid is 112 lbs//ft ^{3}

Line #4 density of isoprophy alcohol is 55 lbs./ft.^{3}

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

Generator Report 1985 CPD Massena

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83

Page No. 1 of 5

(2) [X] GENERATOR EPA ID NUMBER N Y D 0 1 2 8 7 1 4 8 9 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME CENTRAL FOUNDRY DIVISION, GMC

STREET ROOSEVELTOWN HIGHWAY

CITY MASSENA STATE NY ZIP CODE 13662

(3) ☐ TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER N Y D 0 8 0 3 3 6 2 4 1 NYSDEC Facility I.D. No. 3 2 2 0 2 1

NAME CECOS International

STREET 56th St. and Pine Ave.

CITY Niagara Falls STATE NY ZIP CODE 14302

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
WASTE POLYCHLORINATED BIPHENYLS	B 0 0 5	0 2	D 8 1	1 1 0 9 7 0	0 3	0 2
EMPTY DRUMS						
HAZARDOUS WASTE SOLID N.O.S.	F 0 0 1	0 2	D 8 1	8 8 0 3 0 0	0 3	0 2
WASTE SULFURIC ACID	D 0 0 2	0 1	T 2 9	8 1 0 1	0 2	
WASTE CAUSTIC SOLUTION	D 0 0 2	0 1	D 8 1	6 0 0 0 1	0 2	
WASTE ISOPROPYL ALCOHOL	D 0 0 1	0 1	S 0 1	2 0 0 0 1	0 2	
WASTE POLYCHLORINATED BIPHENYLS SOLIDS	B 0 0 5	0 2	D 8 1	1 1 8 0 7 0	0 3	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME ALAN K. STEFFE TITLE PLANT MANAGER

SIGNATURE A. K. Steffe DATE 2/11/84

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 5

GENERATOR EPA ID NUMBER N Y D 1 2 8 7 1 4 8 9 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

CENTRAL FOUNDRY DIVISION, GMC
ROOSEVELTOWN HIGHWAY
MASSENA | STATE NY | ZIP CODE 13662

☐ TRANSPORTER EPA ID NUMBER | NYSDEC Part 364 Permit No.

NAME
STREET
CITY | STATE | ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER I N D 0 0 6 0 3 6 0 9 9 | NYSDEC Facility I.D. No.

NAME CENTRAL FOUNDRY DIVISION
STREET N. JACKSON STREET
CITY BEDFORD | STATE INDIANA | ZIP CODE 47421

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
WASTE POLYCHLORINATED BIPHENYLS	8 0 9 0 1 1	S	0 2	1 8 5 0 8 0 0	0 3	2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME ALAN K. STEFFE | TITLE PLANT MANAGER

SIGNATURE Alan K. Steffe | DATE 2-11-84

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 3 of 5

(1) [X] GENERATOR EPA ID NUMBER N Y D 0 1 2 8 7 1 4 8 9 OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME CENTRAL FOUNDRY DIVISION, GMC

STREET ROOSEVELTOWN HIGHWAY

CITY MASSENA STATE NY ZIP CODE 13662

(2) [ ] TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER A L D 0 0 0 6 2 2 4 6 4 NYSDEC Facility I.D. No.

NAME CHEMICAL WASTE MANAGEMENT

STREET

CITY EMELLE STATE ALABAMA ZIP CODE 35459

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
WASTE POLYCHLORINATED BIPHENYL	8 0 0 9	0 1	D 8 1	3 1 6 6 1 0	0 3	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME ALAN K. STEFFE TITLE PLANT MANAGER

SIGNATURE Alan K. Steffe DATE 2-11-84

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 4 of 5

(2) ☒ GENERATOR EPA ID NUMBER N Y D 0 1 2 8 7 1 4 8 9 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME CENTRAL FOUNDRY DIVISION, GMC

STREET ROOSEVELTOWN HIGHWAY

CITY MASSENA STATE NY ZIP CODE 13662

(3) ☐ TRANSPORTER EPA ID NUMBER _____ NYSDEC Part 364 Permit No. _____

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER N Y D 0 3 0 4 8 5 2 8 8 NYSDEC Facility I.D. No. _____

NAME REVERE SMELTING AND REFINING

STREET BALLARD ROAD, RT. 2

CITY MIDDLETOWN STATE NY ZIP CODE 10940

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON OFF SITE
WASTE BATTERIES	0 0 0 2	0 2	T 1 8	1 4 7 7 4 0	0 3	0 2

I hereby attest under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME ALAN K. STEFFE TITLE PLANT MANAGER

SIGNATURE Alan K. Steffe DATE 2-11-84

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 5 of 5

GENERATOR EPA ID NUMBER N Y D 0 1 2 8 7 1 4 8 9 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

a CENTRAL FOUNDRY DIVISION, GMC

REET ROOSEVELTOWN HIGHWAY

TY MASSENA | STATE NY | ZIP CODE 13662

☐ TRANSPORTER EPA ID NUMBER | NYSDEC Part 364 Permit No.

NAME

STREET

CITY | STATE | ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER O H D 0 8 7 4 3 3 7 4 4 | NYSDEC Facility I.D. No.

NAME CECOS of Ohio

STREET 4879 SPRING GROVE AVENUE

CITY CINCINNATI | STATE OHIO | ZIP CODE 45232

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) % OF SITE
WASTE POLYCHLORINATED BIPHENYL (SLUDGE)	B 0 0 5	0 2	T 3 4	3 7 0 1 2 0	0 3	0 2
WASTE POLYCHLORINATED BIPHENYL (SLUDGE)	B 0 0 5	0 2	S 0 1	1 1 5 2 4 0	0 3	0 2

I certify under penalty of perjury that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

(12) PRINT OR TYPE NAME ALAN K. STEFFE | TITLE PLANT MANAGER

SIGNATURE Alan K. Steffe | DATE 2-11-84

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☒

Explain your non-regulated status in the space below.
All Hazardous Waste Generated Disposed Within The 90 Day Limit.

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

F MI D 00 5 35 66 96 1
(T & C)

This Facility's Non-Regulated Status is Expected to Apply:
☒ For 1983 Only ☐ Permanently
☐ Other (explain in comment section)

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

GM-CENTRAL FOUNDRY - SAG. MALLEABLE IRON

IV. FACILITY MAILING ADDRESS

377 W. CENTER STREET
Street or P.O. Box

SAGINAW | MI | 48605
City or Town | State | Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

Street or Route number

City or Town | State | Zip Code

VI. FACILITY CONTACT

MCINNIS DAVID E.
Name (last and first)

VII. COST ESTIMATES FOR FACILITIES

517-776-3144
Phone No. (area code & no.)

A. Cost Estimate for Facility Closure: $ 0 0 0 0 4 4 0 4 4

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only): $

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. E. Wheeler — Plant Manager — 11/31/84
Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13B(5-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

F A C

F	M	I	D	0	0	5	3	5	6	6	9	6		1
1	2											13	14	15

X. GENERATOR'S EPA I.D. NO.

C	M	I	D	0	0	5	3	5	6	6	9	6
16												28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

GMC-Central Foundry Div.
Saginaw Malleable Iron Plant

ON-SITE ☐

XII. GENERATOR ADDRESS

77 West Center St.
Saginaw, Michigan 48605

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | LBS (AMOUNT OF WASTE / UOM)

S02 (AMOUNT OF WASTE / UOM)

S03 (AMOUNT OF WASTE / UOM)

S04 (AMOUNT OF WASTE / UOM)

S05 (AMOUNT OF WASTE / UOM)

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29 32	1	Waste 1-,1-,1-Trichloro-ethane	P 0 0 1 (33 36 37 40 / 41 44 45 48)	S 0 1 (49 51)	0 0 0 0 0 5 7 2 (52 60)	P (61)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

T/A C

MI|D|0|0|5|3|5|6|6|9|6 (1 2 — 13 14 15)

This Installation's Non-Regulated Status is Expected to Apply:

■ For 1983 Only ☐ Permanently

☐ Other _____

III. NAME OF INSTALLATION

(30) G|M -|C|E|N|T|R|A|L| |F|O|U|N|D|R|Y -|S|A|G| J |M|A|I|L|E|A|B|L|E| |R|O|U|T|E| | (69)

IV. INSTALLATION MAILING ADDRESS

(15 16) 7 7 |W.| |C|E|N|T|E|R| |S|T|R|E|E|T| | | |

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I | D 0 1 0 5 3 5 6 6 9 1 6 | T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

McKesson Envirosystem, Inc.

X. FACILITY'S EPA I.D. NO.

K Y D 0 5 3 3 4 8 1 0 8

XI. FACILITY ADDRESS

State Hwy. #146, P. O. Box 406
New Castle, KT 40050

XII. TRANSPORTATION SERVICES USED

McKesson Chemical Company
27001 Trotley Industrial Drive
Taylor, MI 48180 MID010861524

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste 1-,1-,1-Trichloro-ethane	1,5	F 0 0 1	0 0 0 0 0 5 7 2	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Waste Chlorinated Solvent-Reclaimed

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

MID003910607 TAA C
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GMC WHSG & DIST DIV FLINT
30 69

IV. INSTALLATION MAILING ADDRESS

6060 W BRISTOL RD
15 16 45
Street or P.O. Box

FLINT MI 48554
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 45
Street or Route number

15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

DAWSON WAYNE
15 16 45
Name (last and first)

313-635-5474
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. F. MARCUM

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13 A/C (Revised 11-83)

ot make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.
MID099391067 73 (Rev C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
CHEM-MET

X. FACILITY'S EPA I.D. NO.
MID096916319

XI. FACILITY ADDRESS
18550 ALLEN RD.
WYANDOTTE, MICH.

XII. TRANSPORTATION SERVICES USED
MARINE POLLUTION CONTROL

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure	
	1	HAZ. WASTE LIQ. N.O.S. PHOS. SLUDGE & WATER	15	F006	***369,0000	P.	✓
	2	HAZ. WASTE LIQUID PAINT & WATER	15	D007 D008	****27,5865	P.	✓
	3	FLAMMABLE HAZARDOUS WASTE LIQUID	08	D001 D008	****34,2000	P.	✓
	4	HAZARDOUS WASTE LIQUID	15	F003	****5933.00	P.	✓
	5	HAZARDOUS WASTE LIQUID	12	D001 D008	****276.250	P.	✓
	6	COMBUSTIBLE SOLIDS	01	D001	****27.200	P.	✓
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date Received — Month — Day — Year

VIII. GENERATOR'S EPA I.D. NO.

MIA C
MI D003819677 3
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

NELSON IND. SERVICES

X. FACILITY'S EPA I.D. NO.

MI D091891999
16 28

XI. FACILITY ADDRESS

12345 SCHAEFER Hwy.
DETROIT, MICH.

XII. TRANSPORTATION SERVICES USED

NELSON IND. SERVICES

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
23-32	1	WASTE CHROMIC ACID SOLUTION	02	D007 (39-42)	61,455.0 (51-59)	P. (60)
	2	SPENT SODIUM HYDROXIDE	02	D002	1,818.0	P.
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

(33-34) (35-38) (43-46) (47-50)

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas. See instructions.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.
MI D 003 910 677 T/A C
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
WAYNE DISPOSAL

X. FACILITY'S EPA I.D. NO.
MI D 048 090 633
16 28

XI. FACILITY ADDRESS
49350 N. SERVICE DR.
BELLEVILLE, MICH.

XII. TRANSPORTATION SERVICES USED
INLAND WATER
C.J. ROGERS

XIII. WASTE IDENTIFICATION

Sequence No.	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 30 32	1	HAZ. WASTE - SOLID	17	D008	7,2000	P
			31 34	41 42 45 47 50	51 59	60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

X

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T/A C

MID093911291 2C

1 2 13 14 15

III. NAME OF INSTALLATION

GMC MHSG & DIST DIV - DRAYTON PLAINS

10 69

IV. INSTALLATION MAILING ADDRESS

6060 W BRISTOL RD

15 16 45

Street or P.O. Box

FLINT MI 48554

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5260 WILLIAMS LAKE RD

15 16 45

Street or Route number

DRAYTON PLAINS MI 48020

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

DAWSON WAYNE

15 16 45

Name (last and first)

313-623-5474

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. E. GALBERT

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A/B (8-83) Previous editions are obsolete.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd

VIII. GENERATOR'S EPA I.D. NO.

MIA C

MIDO 0 3 9 1 1 2 9 1 2 0

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET

X. FACILITY'S EPA I.D. NO.

MIDO 9 6 9 6 3 1 9 4

16 28

XI. FACILITY ADDRESS

18550 ALLEN RD.
WYANDOTTE, MICH.

XII. TRANSPORTATION SERVICES USED

MARINE POLLUTION CONTROL

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 13	1	FLAMMABLE SOLIDS	1 2	D 0 0 1	4 * * * 4 4 1 3 5	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

TO BE COMPLETED BY WASTE GENERATOR 1983

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

Cincinnati to SCA # 2425

0789189

Authorization Number 000000

GMLDD Cincinnati 11525 Reading Rd 8415918 9340610093
(Facility Name) Address Phone Number (Generator Number)

Cincinnati Ohio 45241 OHD068953884
City State Zip EPA Number

WASTE HAULER(S):

MR Frank Inc 201 W 155th ST 0079015
Hauler Name Hauler Address S W H Registration Number

Holland, Ill 60473 3125763327 ILD068603604
ILD069506160
S W H Registration Number

Hauler Name Hauler Address Phone Number EPA Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

SCA Chemical Services 11700 S. Stony Island Ave 021600058
(Facility Name) Address Site Number

Chicago IL 60617 312 646 5700 ILD000622121
City State Zip Phone Number EPA Number

Alternate (Facility Name) Address Site Number

City State Zip Phone Number EPA Number

TO BE COMPLETED BY WASTE GENERATOR

WASTE NAME Non Regulated Oil/Greases Lubricants WASTE PHASE Liquid
THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW (Liquid Gaseous Solid)

SHIPPING DESCRIPTION HAZARD CLASS

Non Hazardous Waste — None — None — None
UN or NA Number EPA HW Number

WEIGHT FOR D O T USE 59.85 (LBS) TONS (Circle one) WEIGHT FOR I E P A USE MUST BE CONVERTED TO CU YDS OR GAL QUANTITY OF WASTE DELIVERED 00007.93 1 GALLONS (Circle One) 1 CU YDS 7.93

METHOD OF SHIPMENT (Circle One) (DRUMS Number) TANK TRUCK OPEN TRUCK OTHER (Specify) [5] boxed Consumer Commodity packaging

THIS IS TO CERTIFY THAT THE ABOVE NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I E P A

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION Terry Rasky DATE 4/18/83
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED

(1) Robert Reuter DATE 04 19 83
(Authorized Signature)

(2) (Authorized Signature) DATE / /

DISPOSAL STORAGE OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE HAZARDOUS WASTE SUBJECT TO FEE YES NO

P. Reuter DATE 04 19 83
(Authorized Signature)

COMMENTS OR SPECIAL INSTRUCTIONS

IN ILLINOIS 217 782 3637 *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* OUTSIDE ILLINOIS 800 424 8802 or 202 426 2675

PART 1 GENERATOR PART 2 TSDF PART 3 STATE PART 4 HAULER PART 5 EPA PART 6 GENERATOR

GENERATOR COPY — PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED

TO BE COMPLETED BY WASTE GENERATOR

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

Manifest Number U189190
Authorization Number 000000

GM NDD Cinti (Company Name) 11575 Reading Rd (Address) 513 841 5518 (Phone Number) 9320610093 (Generator Number)
Cincinnati (City) Ohio (State) 45241 (Zip) OHD068953884 (EPA Number)

WASTE HAULER(S)

MR Frank Inc (Hauler Name) 20161 155th St (Hauler Address)
Holland, IL 60473 3125963377 (Phone Number) ILD068603604 (EPA Number) S W = Registration Number 0078615
ILD069506160 S W = Registration Number

(Hauler Name) (Hauler Address) (Phone Number) (EPA Number)

DESTINATION – DISPOSAL STORAGE OR TREATMENT SITE

SCA Chemical Service (Facility Name) 1120 S Stoney Island Ave (Address) 03160058 (Site Number)
Chicago (City) IL (State) 60617 (Zip) 3126465700 (Phone Number) ILD000822121 (EPA Number)

(Alternate Facility Name) (Address) (Site Number)
(City) (State) (Zip) (Phone Number) (EPA Number)

TO BE COMPLETED BY WASTE GENERATOR

WASTE NAME Flammable Liquids - Paint WASTE PHASE Liquid (Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW

SHIPPING DESCRIPTION: Waste Flammable Liquids
HAZARD CLASS: Flammable
UN or NA Number: UN1993
EPA HW Number: D001

WEIGHT FOR D.O.T. USE: 4.55 (LB) (TONS (CIRCLE ONE)) n.05
WEIGHT FOR U.E.P.A. USE MUST BE CONVERTED TO CU YDS OR GAL
QUANTITY OF WASTE DELIVERED: 0 octa 73 (CU YDS) 1 GALLONS (CIRCLE ONE) (1 CU YD = 202) 0.23 (GAL)

METHOD OF SHIPMENT (Circle One): (DRUMS ____ Number) TANK TRUCK OPEN TRUCK (OTHER (Specify) Dry Bulk Consumer Commodity Packaging)

THIS IS TO CERTIFY THAT THE ABOVE NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND U.S. D.O.T.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION Patricia Hensley (Authorized Signature) DATE 4/18/83

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED

(1) Robert T Rochester (Authorized Signature) DATE 04 18 83

(2) _____ (Authorized Signature) DATE / / ____

DISPOSAL STORAGE OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES ____ NO ____

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE.

P Newton (Authorized Signature) DATE 04 19 83

COMMENTS OR SPECIAL INSTRUCTIONS _____

IN ILLINOIS 217 782 3637 "24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS" OUTSIDE ILLINOIS 800 / 424 8802 or 202 / 426 2675

DISTRIBUTION: PART 1 GENERATOR PART 2 IEPA PART 3 IEPA PART 4 HAULER PART 5 IEPA PART 6 GENERATOR

Rev. 4/4

GENERATOR COPY — PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED

This Agency is authorized to require this information under Illinois Revised Statutes 1979, Chapter 111 1/2, Section 22. Disclosure of this information is required. Failure to do so may result in a civil penalty of $10,000 for each violation and each day of violation not to exceed $1,000.00 and other sanctions. (See the Forms Management Section)

TO BE COMPLETED BY WASTE GENERATOR

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

U189191

Authorized Limit 0 00 000

GM-DD Cincin. 1515 Reading Rd 5138415918 9390610093
Cincinnati Ohio 45241 OHD068453884
WASTE HAULER(S)

MR Frank Inc. 201 Wiss St 00790157 0079
Holland, IL 60473 3125963327 ILD068603404
ILD069506160

DESTINATION – DISPOSAL STORAGE OR TREATMENT SITE

S.C.A Chemical Service 1100 S. Stewart Island Ave 031600058
Chicago IL 60617 3124465200 ILD000822121

TO BE COMPLETED BY WASTE GENERATOR

WASTE NAME Chemers-Corrosive WASTE PHASE Liquid

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW

SHIPPING DESCRIPTION HAZARD CLASS

Waste Compound, Cleaning Caustic Liquid NA 1760 0002

WEIGHT FOR D.O.T. USE 685 (LBS. OR M.T.) WEIGHT FOR I.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL. QUANTITY OF WASTE DELIVERED 0.02 1.3 (CU. YDS.) 23 (GAL.)

METHOD OF SHIPMENT (Circle One): DRUMS Number TANK TRUCK DUMP TRUCK OTHER (Specify) Bulk Consumer Commodity Cap. Bulk Ship

THIS IS TO CERTIFY THAT THE ABOVE NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND U.S.E.P.A.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION Terry Lasky DATE 4/18/83
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED

(1) Robert Perkins DATE 04 18 83
(Authorized Signature)

(2) (Authorized Signature) DATE / / /

DISPOSAL STORAGE OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE

HAZARDOUS WASTE SUBJECT TO FEE YES ____ NO ✓

P. Newton DATE 04 19 83
(Authorized Signature)

COMMENTS OR SPECIAL INSTRUCTIONS

IN ILLINOIS 217 / 782 3637 "24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS" OUTSIDE ILLINOIS 800 / 424 9802 or 202 / 426 2675

DISTRIBUTION: PART 1 GENERATOR PART 2 IEPA PART 3 STATE PART 4 HAULER PART 5 IEPA PART 6 GENERATOR

Rev 8-1

GENERATOR COPY — PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED

Any Agency or Author used to require this information under Illinois Revised Statutes, 1979, Chapter 111½, Section 22. Disclosure of this information is required. Failure to do so may result in a fine of not more than $10,000.00, and an additional civil penalty up to $1,000.00 and imprisonment up to one year. This form has been approved by the Forms Management Center.

OHIO ENVIRONMENTAL PROTECTION AGENCY Account Code

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For this reporting year (calendar year) 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print or type with elite type (12 characters per inch).

I. GENERATOR'S EPA I.D. NUMBER

(1) OHDCAST19895

II. NAME OF INSTALLATION

GMC WAREHOUSE & DIST DIV - CLEVELAND

III. INSTALLATION MAILING ADDRESS

(3) 6060 W BRISTOL RD

Street or P.O. Box

(4) FLINT MI 48554

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

(5) 12990 SNOW RD 18

County Code

(6) PARMA OH 44130 5013

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

(7) DAWSON WAYNE 313-635-5474

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification number of all hazardous waste transporters who transported wastes you shipped during the reporting year)

NONE USED.

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted on this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A.J. SANDSTROM A.J. Sandstrom 2/27/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA 9019

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

Report by facility to which all wastes on this page were sent

VIII. GENERATOR'S EPA I.D. NO.

IX. FACILITY'S EPA I.D. NO.

X. FACILITY NAME

XI. FACILITY'S ADDRESS

Street or P.O. Box

City or Town

State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. U.S. EPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by wt item number)

NO WASTE GENERATED, TREATED, OR STORED IN 1983

Page 2 of 2

OhioEPA

January 26, 1984

TO: All Ohio Hazardous Waste Generators Filing 1983 Annual Reports

FROM: Charles J. Wilhelm, Chief, DHMM — Charles J. Wilhelm

SUBJECT: RECYCLING/REDUCTION SURVEY

Purpose of Survey:

A major goal of the Resource Conservation and Recovery Act and the Ohio hazardous waste statute is to encourage as much recycling and reduction of hazardous waste as possible. Recently, waste recycling and reduction have received increased attention as preferred methods to protect the environment, improve business economics and avoid future liability problems. Ohio EPA requests that you complete the following survey questions so that we may better determine the extent of present recycling/reduction and planned future efforts, in addition to obtaining your opinions on this topic.

Survey results will be available in mid-1984, but will not refer to individual companies by name.

Please complete the following and return it along with your "GENERATOR ANNUAL REPORT" for 1983. Send it to:

Ohio EPA
Attention: Annual Reports
Division of Hazardous Materials Management
P.O. Box 1049
Columbus, OH 43216-1049

All questions concerning this survey should be addressed to Anthony Sasson, (614) 462-8971, or Tom Carlisle, (614) 462-8975.

REDUCTION/RECYCLING SURVEY

Facility name WHS & DISTRIB. DIV. CLEVELAND U.S. EPA I.D.# OHD045719895

Facility contact WAYNE DAWSON Telephone #(313) 635-5474

1. During 1983, did your facility recycle or reuse any material that was or would have been classified as a hazardous waste?

___ YES ✓ NO

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

(1) (2) F O H D 0 6 8 9 5 3 8 8 4 (11) (12) (13) (14) (15)

II. NAME OF INSTALLATION

(30) GMC WAREHOUSE & DIST DIV, CINCINNATI (67)

III. INSTALLATION MAILING ADDRESS

(13) (15) (16) 6060 W BRISTOL RD (45)

Street or P.O. Box

(14) (15) (16) FLINT (41) (42) (43) MI 48554 (51)

City or Town — State — Zip Code

IV. LOCATION OF INSTALLATION

(5) (15) (16) 1575 READING RD (47) 31 (48)

County Code

(6) (15) (16) SHARONVILLE (41) (42) (43) OH 45241 (51) (52) 5013 (56)

City or Town — State — Zip Code — Primary SIC Code

V. INSTALLATION CONTACT

(2) (15) (16) DAWSON, WAYNE (45) 313-635-5474 (46) (56)

Name (last and first) — Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED

(list the name an EPA/state identification number of all hazardous waste transporters whose services were used during the reporting year)

MR. FRANK INC. ILD068603604

ILD069506160

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

D.E. DEEVER — Print Type Name

_____ — Title

_____ — Signature of Authorized Representative

3-1-4 — Date Signed

EPA 9019

Page 1 of 2

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31 19 83

FACILITY INFORMATION

(specify for city where all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

C OHD068953884

IX. FACILITY'S EPA I.D. NO.

ILD000672121

X. FACILITY NAME

SCA CHEMICAL SERVICES

XI. FACILITY'S ADDRESS

11700 S. STONEY ISLAND AVE

Street or P.O. Box

CHICAGO IL 60617

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	FLAMMABLE LIQUIDS-PAINT	07	D001	455	P
2	CORROSIVE LIQUID-CLEANER	02	D002	685	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
(2) Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

NVD000626029 (T+A C)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently
☐ Other _____

III. NAME OF INSTALLATION

GMC MHSG & D IST DIV - RENO

IV. INSTALLATION MAILING ADDRESS

Street or P.O. Box: 6060 W BRISTOL RD

City or Town: FLINT — State: MI — Zip Code: 48554

V. LOCATION OF INSTALLATION (if different than section IV above)

Street or Route number: 555 NISTA BLVD

City or Town: SPARKS — State: NV — Zip Code: 89431

VI. INSTALLATION CONTACT

Name (last and first): DAWSON WAYNE

Phone No. (area code & no.): 313-635-5474

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted on this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. R. PATTERSON — 2/29/84

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: [illegible] Rec'd By: [illegible]

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

16 28

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1		33 34	35 38 39 42 43 46 47 50	51 54	55
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

No waste generated, treated, or stored in 1983

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
(2) Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

NYD092471341 T/A C

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GMC MH/SG & I DIST DIV - BUFFALO

IV. INSTALLATION MAILING ADDRESS

60000 W BRISTOL RD

Street or P.O. Box

FLINT MI 48554

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

2615 MALDEN AVE

Street or Route number

CHEEKTOWAGA NY 14240

City or Town State Zip Code

VI. INSTALLATION CONTACT

DAWSON WAYNE

Name (last and first)

313-635-5474

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J.C. CARREIRO - PLANT MGR. 2/28/84

Print/Type Name Title Signature of Authorized Representative Date Signed

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: Rec'd By:

VIII. GENERATOR'S EPA I.D. NO.

f/a C

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

(F)

16 28

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
23	1		33 34	35 38 39 42 43 46 47 50	51 59	60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

No waste generated, treated, or stored in 1983

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-Handler
(2) Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

T.S.C.
N Y D 0 6 8 0 3 6 6 7 2 [illegible]
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GMC MHSG & IDIST DIV - NEW YORK
10 69

IV. INSTALLATION MAILING ADDRESS

6060 W BRISTOL RD
15 16 45
Street or P.O. Box

FLINT MI 48554
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

1115 CENTRAL AVE
15 16 45
Street or Route number

SOUTH BETHPAGE L.I. NY 11714
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

DAWSON WAYNE
15 16 45
Name (last and first)

313-635-5474
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

D.R. FROHOCK _____ _____ _____
Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form and state and regional addresses

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd | Rec'd by

VIII. GENERATOR'S EPA I.D. NO.

T I A C

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

(F)

16 28

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
20 13	1		33 34	35 38 39 42 43 46 47 50	51 59	60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Turn over for more

XIV. COMMENTS (enter information by section number—see instructions)

No waste generated, treated, or stored in 1983

Do not fill in the entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
(2) Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

MDD053944229 (T/A/C)
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently
☐ Other _____

III. NAME OF INSTALLATION

GMC MHSG & DIST DIV - BALTIMORE
10 69

IV. INSTALLATION MAILING ADDRESS

6060 W BRISTOL RD
15 16 45
Street or P.O. Box

FLINT MI 48554
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

1809 PARKWAY DR
15 16 45
Street or Route number

HANOVER MD 21203
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

DAWSON WAYNE
15 16 45
Name (last and first)

313-635-5474
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

C.A. JACKSON _____ _____ 1/29/84
Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A/B (1/84) Previous Editions

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date Rec'd: Rec'd By:

VIII. GENERATOR'S EPA I.D. NO.

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1					
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

No waste generated, treated, or stored in 1983

Department of Environmental Protection
Division of Waste Management
Bureau of Hazardous Waste Classification and Manifest

NJD 052092673 NJT
EPA ID number (If one was issued)

G.M.C. WAREHOUSING & DIST. DIV. - NEWARK 201-894-4760
Company Name Phone Number

385 NORDOFF PLACE
Street Address

ENGLEWOOD N.J. 07631
City County State Zip

Mail Address Street Address (If different)

City County State Zip

Latitude Longitude

313-635-5474
Emergency Phone

Generator NONE Transporter Facility
Company Type (Please check that which applied to your Company)

5013
SIC Code

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF HAZARDOUS WASTE
GENERATOR'S ANNUAL REPORT
FOR YEAR OF 1983

1. GENERATOR'S NAME G.M.C. WAREHOUSING & DIST DIV.-NEWARK 2. EPA ID NO. NJD 052092673
3. ADDRESS 385 NORDOFF PLACE ENGLEWOOD, N.J 07631 TELEPHONE
4. TRANSPORTER'S NAME 5. EPA ID NO
5. ADDRESS
7. FACILITY'S NAME 8. EPA ID NO
9. ADDRESS
10. MANIFEST NO DESCRIPTION OF WASTE DOT HAZ.CLASS QUANTITY UNITS EPA WASTE TYPE REJECTED

NO WASTE MANIFESTED DURING 1983

751

* - PLACE AN "*" UNDER THE REJECTED COLUMN FOR THOSE MANIFESTS REJECTED BY FACILITY.

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
(2) Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

T/A C

MOD051728905

1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GMC MH&G E DIST DIV - ST LOUIS

10 69

IV. INSTALLATION MAILING ADDRESS

6060 W BRISTOL RD

15 16 45

Street or P.O. Box

FLINT MI 48554

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5801 N LINDBERGH BLVD

15 16 45

Street or Route number

HAZELWOOD MO 63042

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

DAWSON WAYNE

15 16 45

Name (last and first)

313-635-5474

46 53

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

G.E. GRAVES		Gary E Graves	3-1-84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8700-13A/C (8/81) Revised (7-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd | Rec'd By

VIII. GENERATOR'S EPA I.D. NO. (1 2 ... 13 14 15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO. (16 ... 28)

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code (33 34)	C. EPA Hazardous Waste No. (see instructions) (35 38 39 42 43 46 47 50)	D. Amount of Waste (51 59)	E. Unit of Measure (60)
29 32	1					
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

No waste generated, treated, or stored in 1983

Type or enter entries in shaded areas

OMB # 2050-0024, Expires 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non handler
(2) Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

T A C

MND076502806 (1 2 ... 13 14 15)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GMC MHSG EI DIST DIV - MINNEAPOLIS (10 ... 69)

IV. INSTALLATION MAILING ADDRESS

16060 W BRISTOL RD (15 16 ... 45)
Street or P.O. Box

FLINT (15 16 ...) MI 48554 (41 42 47 ... 51)
City or Town — State — Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

7600 METRO BLVD (15 16 ... 45)
Street or Route number

EDINA (15 16 ...) MN 55440 (41 42 47 ... 51)
City or Town — State — Zip Code

VI. INSTALLATION CONTACT

DAWSON WAYNE (15 16 ... 45)
Name (last and first)

313-635-5474 (46 ... 57)
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

M.O. CARTER — M. O. Carter — 2-27-84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13 A/B (Rev. 11-83) Previous editions are obsolete.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

(G) T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

(F)

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
25 32	1		33 34	35 38 39 42 43 46 47 50	51 59	60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

NO WASTE GENERATED, TREATED, OR STORED IN 1983

Do not fold. Do not staple. Type or print in ink. Use only capital letters. Do not enter data in shaded areas.

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
(2) Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

T/A C
KYD068335231
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GMC MHSG & DIST DIV - LOUISVILLE
30 69

IV. INSTALLATION MAILING ADDRESS

6060 W BRISTOL RD
15 16 45
Street or P.O. Box

FLINT MI 48554
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

4501 INDIAN TRAIL
15 16 45
Street or Route number

LOUISVILLE KY 40232
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

DAWSON WAYNE
15 16 45
Name (last and first)

313-635-5474
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

W.A. DANIEL — W.A. Daniel — 3/1/84

Print/Type Name | Title | Signature of Authorized Representative | Date Signed

EPA Form 8700-13A/S.ant (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

16 38

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
23 32	1		33 34	35 38 39 42 43 46 47 50	51 59	60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

No waste generated, treated, or stored in 1983

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field, Topeka, Kansas 66620
Division of Environment
913-862-9360

SPECIAL INSTRUCTIONS FOR NON-REGULATED STATUS
HAZARDOUS WASTE GENERATORS - 1983

If your facility had non-regulated status the entire year, answer the applicable questions below:

Company Name GMC, Whs. & Dist. Div.-Kansas City T&C EPA ID No. KST2100101867

Address: City 3100 Fiberglass Kansas City State Kansas Zip Code 66115

If a small quantity or exempt generator, list types of waste; quantities and handling method (i.e., disposal method/beneficial use/reuse/recovery/recycling).

WASTE	QUANTITY/YEAR	HANDLING METHOD
Chlorinated Solvent		
Nonchlorinated Solvent		
Flammable Gas		
Flammable Solid		
Flammable Liquid		
Oxidizer		
Acids		
Bases		
Chromic Acid		
Corrosive Material		
Sodium Hydroxide Solution		
Potassium Hydroxide Solution		
Reactive Waste		
Organic Peroxide		

over

WASTE	QUANTITY/YEAR	HANDLING METHOD
Poison B		
Pesticides		
Herbicides		
Heavy Metal Sludge		

If exempt from regulation, please check the reason(s).

- ☐ Farmer disposing of waste pesticides from his own use.
- ☐ Waste from growing and harvesting agricultural crops.
- ☐ Waste from raising of animals, including animal manures.
- ☐ Mining overburden returned to the mine site.
- ☐ Fly ash; ☐ Botton ash; ☐ Slag waste; and ☐ flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels.
- ☐ Drilling fluids; ☐ produced waters; and ☐ other wastes associated with the exploration, development or production of crude oil, natural gas, or geothermal energy.
- ☐ Waste is EP toxic for chromium but is exclusively trivalent, generated from process which uses trivalent chromium only, and the process is managed in an nonoxidizing environment.
- ☐ Waste is being discharged under NPDES Permit.
- ☐ Waste is being discharged to city sanitary sewer.

If waste is beneficially used, please check the reason(s).

- ☐ On site solvent recovery.
- ☐ Being accumulated; ☐ stored; or ☐ physically; ☐ chemically or ☐ biologically treated prior to beneficial ☐ use; ☐ reuse; or ☐ recycling or ☐ reclamation.

☒ No hazardous waste was generated by my facility.

C. T. Spillers
Signature of Authorized Agent
W. B. HINE

2-27-84
Date

DEPARTMENT OF ENVIRONMENTAL REGULATION
GENERATOR ANNUAL HAZARDOUS WASTE REPORT

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1983

GENERAL INSTRUCTIONS: PLEASE REFER TO THE SPECIFIC INSTRUCTIONS BEFORE COMPLETING THIS FORM. THE INFORMATION REQUESTED IN THIS REPORT IS REQUIRED BY RULE (CHAPTER 17-30, FLORIDA ADMINISTRATIVE CODE).

THE DATA BELOW IS WHAT THE DEPARTMENT OF ENVIRONMENTAL REGULATION HAS ON FILE. IF ANY ITEM IS INCORRECT, PLEASE FILL IN THE CORRECTED INFORMATION IN THE SPACE PROVIDED.

EPA/DER ID NUMBER:	FLD079200978
FACILITY NAME:	GENERAL MOTORS PART DIVISION
MAILING ADDRESS:	6060 W. BRISTOL ROAD
CITY, STATE, ZIP:	FLINT MI 48554
FACILITY LOCATION:	8206 PHILLIPS HIGHWAY, JACKSONVILLE, FL
CONTACT PERSON:	WAYNE DAWSON, SR ENGINEER
PHONE:	313-635-5474
LAT/LONG:	30.13.10/81.35.13

I. EPA/DER ID NUMBER ----------

II. GENERATOR NAME ----------

III. MAILING ADDRESS 6060 W. BRISTOL RD.

CITY, STATE, ZIP ---------- --- ---------

IV. FACILITY LOCATION ----------

CITY, STATE, ZIP ---------- --- -------

V. CONTACT PERSON W. DAWSON SUPV. ENV. CONTROL

PHONE (---) --- - ----

VI. LATITUDE LONGITUDE --- • --- • --- / --- • --- • ---

VII. CERTIFICATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

R. A. STONE P.D.C. MANAGER
PRINT/TYPE NAME TITLE

SIGNATURE OF AUTHORIZED REPRESENTATIVE DATE SIGNED

EPA ID: FLD079209978 GMS-ID: 3116080342

DEPARTMENT OF ENVIRONMENTAL REGULATION
GENERATOR ANNUAL HAZARDOUS WASTE REPORT

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1983

VIII. THIS SECTION MUST BE COMPLETED BY GENERATORS THAT NOTIFIED EPA OR DER OF HAZARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA OR CHAPTER 403, FS, BUT DID NOT HANDLE QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING THE REPORTING YEAR THAT ARE SUBJECT TO THE GENERATOR ANNUAL REPORTING REQUIREMENTS.

PLEASE CIRCLE THE APPROPRIATE CODE(S) AT RIGHT WHICH BEST DESCRIBES YOUR INSTALLATION STATUS FOR THE REPORTING YEAR.

CODE

A. NON-HANDLER -- DID NOT HANDLE HAZARDOUS WASTE IN ANY QUANTITY DURING THE REPORTING YEAR..... 1

B. SMALL QUANTITY GENERATOR -- DID NOT GENERATE MORE THAN 1000 KG. OF HAZARDOUS WASTE (OR 1 KG. OF ACUTELY HAZARDOUS WASTE) IN ANY SINGLE MONTH OR ACCUMULATE MORE THAN 1000 KG. OF HAZARDOUS WASTE (OR 1 KG. OF ACUTELY HAZARDOUS WASTE) ON-SITE AT ANY TIME DURING THE REPORTING YEAR IN ACCORDANCE WITH 40 CFR PART 261.5 ..... (2)

C. EXEMPT - ALL WASTES GENERATED IN FARMING OPERATIONS IN ACCORDANCE WITH 40 CFR PART 262.51, OR EXEMPT PURSUANT TO 40 CFR PART 261.4 3

D. BENEFICIAL USE -- ALL HAZARDOUS WASTE GENERATED WAS BENEFICIALLY USED, REUSED, OR RECYCLED IN ACCORDANCE WITH 40 CFR PART 261.6(A)..... 4

E. CLOSED -- INSTALLATION WAS CLOSED PRIOR TO THE REPORTING YEAR 5

GENERATORS THAT MEET ONE OF THE ABOVE EXEMPTIONS ARE NOT REQUIRED TO COMPLETE SECTIONS IX - XI OF THIS ANNUAL REPORT IDENTIFYING HAZARDOUS WASTE SHIPPED OFF-SITE DURING THE REPORTING YEAR.

EPA-ID: FLD [illegible]3978 GMS-ID: 3116P80352

DEPARTMENT OF ENVIRONMENTAL REGULATION
GENERATOR ANNUAL HAZARDOUS WASTE REPORT

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1983

IX. FACILITY NAME AND LOCATION TO WHICH ALL WASTES LISTED ON THIS PAGE WERE SHIPPED. A COPY OF THIS SHEET MUST BE FILLED OUT FOR EACH FACILITY THAT RECEIVED HAZARDOUS WASTES.

FACILITY NAME _____ EPA/DER ID NO _____

FACILITY LOCATION _____

CITY _____ STATE ____ ZIP CODE _____

X. TRANSPORTATION SERVICES USED. LIST THE NAME AND EPA/DER IDENTIFICATIO NUMBER OF ALL TRANSPORTERS WHOSE SERVICES WERE USED DURING THE REPORTING YEAR. COMPLETE THIS SECTION ONLY ONCE. DO NOT REPEAT ON SUPPLEMENTAL SHEETS. (SEE INSTRUCTIONS)

TRANSPORTER NAME	TRANSPORTER EPA/DER ID NO

XI. WASTE IDENTIFICATION

	(A) DESCRIPTION OF WASTE	(B) DOT HAZARD CODE	(C) EPA HAZARDOUS WASTE NUMBER (SEE INSTRUCTIONS)	(D) AMOUNT OF WASTE	(E) UNIT OF MEASURE
1					
2					
3					
4					
5					
6					

COMMENTS: NO WASTE GENERATED, TREATED, OR STORED.

WASTE	QUANTITY/YEAR	HANDLING METHOD
Poison B		
Pesticides		
Herbicides		
Heavy Metal Sludge		

If exempt from regulation, please check the reason(s).

- ☐ Farmer disposing of waste pesticides from his own use.
- ☐ Waste from growing and harvesting agricultural crops.
- ☐ Waste from raising of animals, including animal manures.
- ☐ Mining overburden returned to the mine site.
- ☐ Fly ash; ☐ Botton ash; ☐ Slag waste; and ☐ flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels.
- ☐ Drilling fluids; ☐ produced waters; and ☐ other wastes associated with the exploration, development or production of crude oil, natural gas, or geothermal energy.
- ☐ Waste is EP toxic for chromium but is exclusively trivalent, generated from process which uses trivalent chromium only, and the process is managed in an nonoxidizing environment.
- ☐ Waste is being discharged under NPDES Permit.
- ☐ Waste is being discharged to city sanitary sewer.

If waste is beneficially used, please check the reason(s).

- ☐ On site solvent recovery.
- ☐ Being accumulated; ☐ stored; or ☐ physically; ☐ chemically or ☐ biologically treated prior to beneficial ☐ use; ☐ reuse; or ☐ recycling or ☐ reclamation.

☒ No hazardous waste was generated by my facility.

L.M. McCord
Signature of Authorized Agent
L.M. McCORD

2-27-84
Date

20 GENERATOR ANNUAL HAZARDOUS WASTE REPORT 20

This report is for the calendar year ending December 31, 1983

FOR AGENCY USE ONLY

FOR AGENCY USE L | P | H | W | C | CARD TYPE 2 | 0 | TRANS CODE A | DATE ENTERED

GENERAL INSTRUCTIONS

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM

The information requested in this report is required by Federal and State law

Please print/type with elite type (12 characters per inch)

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the calendar year covered by this report. Circle the one numeric code (1 thru 5) that best describes your status during the entire year (see instructions for explanation of codes) and explain in Comment Section.

(1) Non-handler

(2) Small Quantity Generator

(3) Exempt

(4) Beneficial Use

(5) Closed

This installation's Non-Regulated Status is expected to apply:

(6) For 1983 only, explain in Comment Section.

(7) Permanently, explain in Comment Section.

(8) Other, explain in Comment Section.

II. REGULATED STATUS

See instructions for completing this and following sections.

III. GENERATOR'S USEPA I.D. NUMBER

I L D 0 1 0 5 9 1 1 9 3 1

IV. GENERATOR'S ILLINOIS I.D. NUMBER

V. NAME OF INSTALLATION

W.H.S. & DIST. DIV. CHICAGO T&C GEN. MOT.

VI. INSTALLATION MAILING ADDRESS

6060 W. BRISTOL RD.

Street or P.O. Box

FLINT, MI 48554

City or Town State Zip Code

VII. LOCATION OF INSTALLATION (if different than section VI above)

4734 W. ROOSEVELT RD.

Street or Route number

CHICAGO, IL. 60650

City or Town State Zip Code

VIII. INSTALLATION CONTACT

WAYNE DAWSON

Name (last and first)

313-635-5474

Phone No. (area code & no.)

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111½, Sections 1021 and 1021 (b)(2). Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues, a fine up to $1,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. L. NORRISH

Print/Type Name Title Signature of Authorized Representative Date Signed

Page 0 0 1 of ____

DETACH HERE

20 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT 20

This report is for the calendar year ending December 31, 1983.

FOR AGENCY USE ONLY

FOR AGENCY USE | L I P H W C | (1–5) | CARD TYPE | 2 0 | (6–7) | TRANS CODE | A | (8) | DATE ENTERED | _ _ / _ _ / _ _ | (9–14)

GENERAL INSTRUCTIONS

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.
The information requested in this report is required by Federal and State law.

Please print/type with elite type (12 characters per inch)

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the calendar year covered by this report. Circle the one numeric code (1 thru 5) that best describes your status during the entire year (see instructions for explanation of codes), and explain in Comment Section.

1 Non-handler
(2) Small Quantity Generator
3 Exempt
4 Beneficial Use
5 Closed

This installation's Non-Regulated Status is expected to apply:

6 For 1983 only, explain in Comment Section.
(7) Permanently, explain in Comment Section.
8 Other, explain in Comment Section.

II. REGULATED STATUS

See instructions for completing this and following sections.

III. GENERATOR'S USEPA I.D. NUMBER: ILD068603604 (12–23)

IV. GENERATOR'S ILLINOIS I.D. NUMBER: 0310300025 (24–33)

V. NAME OF INSTALLATION
G.M.C. WAREHOUSING & DISTRIBUTION DIV. – CHICAGO

VI. INSTALLATION MAILING ADDRESS
6060 W. BRISTOL RD.
Street or P.O. Box

FLINT — MI. — 48554
City or Town — State — Zip Code

VII. LOCATION OF INSTALLATION (if different than section VI above)
2600 S. 26th AVE
Street or Route number

BROADVIEW — IL — 60153
City or Town — State — Zip Code

VIII. INSTALLATION CONTACT
DAWSON, WAYNE
Name (last and first)

313-635-5474
Phone No. (area code & no.)

This Agency is authorized to require the information under Illinois Revised Statutes, 1981, Chapter 111 2, Sections 1004 and 1021 (b)(2). Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues, a fine up to $1,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

M.L. THOMPSON — Print Type Name
Title
M K Thompson — Signature of Authorized Representative
2/27/84 — Date Signed

Page 0 0 1 (40–42) of 1

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
(2) Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

COD049417207 T/A C
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GMC WHSG & DIST DIV - DENVER T&C
30 69

IV. INSTALLATION MAILING ADDRESS

6060 N BRISTOL RD
15 16 45
Street or P.O. Box

FLINT MI 48504
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

4711 E COLORADO BLVD
15 16 45
Street or Route number

DENVER CO 80216
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

DAWSON WAYNE
15 16 45
Name (last and first)

313-635-5474
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

C.E. OSBORN

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A/S-80 (Revised 11-83)

Do not write in shaded areas.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

16 28

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code (33 34)	C. EPA Hazardous Waste No. (see instructions) (35 38 39 42 / 43 46 47 50)	D. Amount of Waste (51 59)	E. Unit of Measure (60)
	1					
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

No waste generated, treated, or stored in 1983

42-590 1151

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I D 0 1 7 0 7 9 6 2 5 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

NELSON INDUSTRIAL SERVICES

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 8 0 1 1 9 9 2

XI. FACILITY ADDRESS

12345 SCHAEFER HWY.
DETROIT, MICHIGAN

XII. TRANSPORTATION SERVICES USED

NELSON INDUSTRIAL SERVICES MID098011992
VALLEY CITY REFUSE INC. MID055875373

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	CYANIDE CONTAMINATED DEBRIES OR MUD FROM PLATING BATHS	8	D003 D016	30	T
	2	WASTE CHROMIC ACID MIXTURE LIQUID FROM PLATING	8	D007	24	T
	3	WASTE CYANIDE SOLUTION FROM PLATING OPERATION	8	D003 D016	676	T
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 1 1 7 0 1 9 6 2 5 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

METAL WORKING LUBRICANTS

X. FACILITY'S EPA I.D. NO.

F I N D 0 0 0 6 4 6 9 5 0

XI. FACILITY ADDRESS

1509 SOUTH SENATE AVE.
INDIANAPOLIS, INDIANA 46225

XII. TRANSPORTATION SERVICES USED

YODER TRUCK LINES MIT270013683
VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	WASTE OIL SOLD TO RECLAIMER	0 1	D 1 8 1	1 9 0 0	T
	2	OILY RAG SLUDGE FROM WATER TREATMENT	0 1	D 0 0 1	2 0	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd ____ Rec'd by ____

VIII. GENERATOR'S EPA I.D. NO.

G M I I D 0 1 1 7 0 1 7 9 6 1 2 5 T/A C
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

TRICIL

X. FACILITY'S EPA I.D. NO.

F M I D 0 7 2 5 8 5 7 5 5
16 28

XI. FACILITY ADDRESS

3030 WOOD ST.
MUSKEGON HTS. MICHIGAN 49444

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	OILY RAG SLUDGE FROM WASTEWATER TREATMENT	33 34	D 0 0 1 35 38 39 42	1 9 43 46 47 50 51 59	T 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date received: Received by:

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I D 1 7 0 7 9 6 2 5 3 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 7 2 4 8 3 1

16 28

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE
BELLEVILLE, MICHIGAN

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	SLUDGEFILTER CAKE FROM WASTE-WATER TREATMENT	15 (33 34)	F D D 6 (35 38 / 39 42 / 43 46 / 47 50)	1 6 (51 59)	T (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd. ____ Rec'd by ____

VIII. GENERATOR'S EPA I.D. NO.

MID 107 079 625 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL II

X. FACILITY'S EPA I.D. NO.

FMID 048 090 633

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE
BELLEVILLE, MICHIGAN

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	SLUDGE FILTER CAKE FROM WASTE-WATER TREATMENT	15	D006	14 10 10	T
	2	WASTE GREASE FROM COLD FORMING OPERATION	15	D008	2 6	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd ____ Rec'd by ____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 1 7 0 1 9 6 2 5 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

GRANGER LAND DEVELOPMENT

X. FACILITY'S EPA I.D. NO.

F M I D 0 8 2 7 7 1 7 0 0

XI. FACILITY ADDRESS

8550 W. GRAND RIVER
GRAND LEDGE, MICHIGAN 48837

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	WASTE GREASE FROM COLD FORMING OPERATION	1, 5	D 0 0 8	18	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ONE SHIPMENT, MARCH OF 83. RPD NO LONGER USES THIS FACILITY.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd ____ Rec'd by ____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 1 7 0 7 9 6 2 5 (T/A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

AMERICAN CHEMICAL SERVICES

X. FACILITY'S EPA I.D. NO.

F I N D 0 1 6 3 6 0 2 6 5

XI. FACILITY ADDRESS

420 S. COLFAX AVE.
GRIFFITH, INDIANA 46319

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	TRICHLOR STILL BOTTOMS FROM VAPOR DEGREASING	0 1 (33 34)	F 0 0 1 (35 38 / 39 42 / 43 46 / 47 50)	2 5 (51 59)	T (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 1 7 0 7 9 6 2 5 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MCKESSSON ENVIRONMENTAL SYSTEMS

X. FACILITY'S EPA I.D. NO.

F K Y D 0 0 5 1 3 1 4 8 1 1 0 8

XI. FACILITY ADDRESS

STATE HIGHWAY 146
P.O. BOX 146
NEW CASTLE, KY 40050

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence No.	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	TRICHLOR STILL BOTTOMS FROM VAPOR DEGREASING	0 1	F 0 0 1	4 7	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 1 7 0 7 9 6 2 5 — T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ORGANIC CHEMICALS INC.

X. FACILITY'S EPA I.D. NO.

M I D 9 9 0 8 5 8 0 0 3

XI. FACILITY ADDRESS

3291 CHICAGO DRIVE
GRANDVILLE, MICHIGAN 49418

XII. TRANSPORTATION SERVICES USED

SPARTAN CHEMICAL MID079300125

XIII. WASTE IDENTIFICATION

Sequence	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	WASTE FREON FROM VAPOR DEGREASING	0 1	F 0 0 1	1 9	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

RECLAIMED AND RETURNED IN ORIGINAL DRUMS

TEXAS DEPARTMENT OF WATER RESOURCES
SOLID WASTE REPORTING SUBUNIT
ENFORCEMENT AND FIELD OPERATIONS
P.O. BOX 13087, CAPITOL STATION
AUSTIN, TEXAS 78711

TSD Facility Permit No. [3][4][7][1]

EPA TSD Facility ID No. [T][X][D][0][9][5][2][3][7][2][0][4]

Gen. No. [G][1]

Report Year [1][2][19][8][3]

ANNUAL SITE SUMMARY
0500

To be completed ANNUALLY by the Treatment, Storage and Disposal (TSD) facility owner/operator and generators of Class I & II Industrial Waste and submitted to the TDWR by the 21st of each January for the prior year. The report is also to include information on the off-site disposal of Class II Waste. (See the reverse side instructions.)

TSD Facility/GENERATOR'S NAME: AC SPARK PLUG DIVISION GMC PHONE 817-855-7066

BUSINESS ADDRESS: 8600 CENTRAL FREEWAY NORTH, WICHITA FALLS, TEXAS ZIP 76306

PART I: ON-SITE DISPOSAL RECORDS TO BE COMPLETED BY TSD ON-SITE FACILITY OWNER/OPERATOR AND GENERATORS OF TDWR CLASS I & II WASTE AND CLASS II WASTE OFF SITE DISPOSAL

1 TEXAS WASTE CODE	2 QUANTITY GENERATED	3*	4 QUANTITY HANDLED	5*	6 FACILITY COMPONENT NUMBER	7** HAZARDOUS CODES	8 COMMENTS
27976	6030	3	6030	3	H	14 2 8	

*Enter one number. (1) Tons, (2) Gallons, (3) Cubic Yards, (4) Drums (55 gal.)
**Only applicable for hazardous wastes.

PART II: COST ESTIMATES FOR FACILITIES TO BE COMPLETED BY TSD FACILITY OWNER/OPERATOR

A. Cost estimate for facility closure

$[ ][ ][ ].[ ][ ][ ].[ ][ ][ ] (93)

B. Cost Estimate for post closure monitoring and maintenance. (Disposal facilities only)

$[ ][ ][ ].[ ][ ][ ].[ ][ ][ ] (102)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

R. Marcus Smith — 2-16-84

777

ion of Land Pollution Control
IA STATE BOARD OF HEALTH
130 West Michigan Street
P. O. Box 1964
dianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 9 | 4 | 4 | 6 | 9 | 9 | 1 | 3 |

X. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

ist the EPA Identification Numbers for all transporters whose services were used during he year.

IND 000 806 836

XI. FACILITY'S NAME (specify) — FACILITY'S EPA ID NUMBER

A|L|L|I|S|O|N| |C|A|S| |T|U|R|B|I|N|E| |O|P|E|R|S| |G|M|C| | | I|N|D|0|9|4|4|6|9|9|1|3|

XI. FACILITY'S ADDRESS

Street or P. O. Box | P|.| O|.| B|O|X| |4|2|0| | | |

ision of Land Pollution Control
IANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

IND000806836 Plant 5 1026
~~Detroit Diesel Allison Div GMC~~
P.O. Box ~~Box~~ 420
Indianapolis IN 46206
Allison Gas Turbine Opers GMC

FORM E:

Installation Identification Form

ENVIRONMENTAL MANAGEMENT BOARD

NSTRUCTIONS: Please refer to the specific instructions before completing this form. The nformation requested herein is required by IC 13-7-8.5-2.

I. TYPE OF HAZARDOUS WASTE REPORT FOR THE YEAR ENDING DEC. 31, 19 81

FORM G: GENERATOR ANNUAL REPORT	[X]	FORM F: FACILITY ANNUAL REPORT	[X]
DID NOT GENERATE/TSD HAZARDOUS WASTE	[ ]	SMALL QUANTITY GENERATOR OF HAZARDOUS WASTE	[ ]

II. INSTALLATION'S EPA I.D. NUMBER IND000806836

III. NAME OF INSTALLATION Plant 5

IV. INSTALLATION MAILING ADDRESS

Street or P. O. Box P.O. BOX 420

City or Town INDIANAPOLIS

State IN Zip Code 46206

V. LOCATION OF INSTALLATION

Street or P. O. Box 2355 SOUTH TIBBS AVE

City or Town INDIANAPOLIS

State IN Zip Code 46206 County MARION

VI. INSTALLATION CONTACT

Last Name BARNES First Name R G Phone (area code & no.) 317/241-4467

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

F. B. WALLACE (A.) PRINT OR TYPE NAME

(B.) SIGNATURE

(C.) DATE SIGNED

Please print or type with ELITE type (12 characters per inch).

81 164 001

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
T	M	I	D	0	0	5	3	5	6	7	8	7		T

III. NAME OF INSTALLATION

30 G M C F I S H E R B O D Y D I V. D E T R O I T F O R T S T P L T 69

IV. INSTALLATION MAILING ADDRESS

15 16 3 6 3 0 7 W E S T F O R T S T R E E T 45

Street or P.O. Box

15 16 4 D E T R O I T 41 42 M I 47 4 8 2 0 9 51

City or Town State Zip Code

Tear out here

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 5 45

Street or Route number

15 16 6 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

15 16 7 M E L V I N A G I L M E R J R 45

Name (last and first)

46 3 1 3 – 5 5 4 – 7 0 1 0 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. W. Powser	Plant Manager		2/16/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8700-13A(3-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 7 8 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 Princeton Avenue
P. O. Box 431
Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Environmental Waste Control
27140 Princeton Avenue
Inkster, Michigan 48141 EPA I. D. No. MID 057002602

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste Methylene Chloride Mixture of Isocianates and Polyol From Foam Flush	1 9	D 0 0 2 D 0 0 8	1 3 6 9 5	G
	2	Waste Corrosive Liquid From Plater Basement	0 2	F 0 0 6	5 2 8	P
	3	Waste Chromic Acid Sludge From Plater Basement	0 2	D 0 0 7 F 0 0 6	1 6 7	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here:

XIV. COMMENTS (enter information by section number—see instructions)

Waste Methylene Chloride = 11.0 lbs./gal.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

C M I D 0 0 5 3 5 6 7 8 7 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met Services, Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 9 6 3 1 9 4

16 28

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, Michigan 48192

XII. TRANSPORTATION SERVICES USED

Nelson Industrial Services
12345 Schaefer Highway
Detroit, Michigan 48227 EPA I.D. No. MID 088011992

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste Methylene Chloride Mixture of Isocyanates and Polyol From Foam Line Flush	1, 5	F, 0, 0, 2 / 0, 0, 8, 0	1, 5, 4, 0	G
	2	Hazardous Waste Solid From Paint Line	1, 5	D, 0, 0, 1	1, 2, 6, 5	G
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Item #1 - 11.0 lbs./gal.
Item #2 - 9.8 lbs./gal.

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 7 8 7 F T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 Princeton Avenue
P. O. Box 431
Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental
22077 Mound Road
Warren, Michigan 48091 MID 087478574

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Obsolete S. C. 3070 ID Solvent From Western Eaton Dot S. N. Solvent Mixture N.O.S.	0,8	D,0,0,1	4,0,2	P
	2	Obsolete S. C. 3D Solvent from Western Eaton Dot S. N. Solvent Mixture N.O.S.	0,8	D,0,0,1	1,6,0,6	P
	3	Obsolete #114 Stripper Dot S. N. Dichloromethane	1,5	U,0,8,0	6,0,5	P
	4	Obsolete Di-Octyl Phthalate Dot S. N. ORM-A, N.O.S.	1,5	U,1,0,7	9,1,7	P
	5	Obsolete 44-24 Solvent Dot S. N. Paint Reducing Liquid	0,8	D,0,0,1	4,0,2	P
	6	Obsolete Permalastic Adhesive Dot S. N. Cement Liquid N.O.S.	0,8	D,0,0,1	3,4,1	P
	7	Obsolete Trichloromonofluoro-Methane Dot S. N. ORM-A N.O.S.	1,3	U,1,2,1 F,0,0,2	4,0,2	P
	8	Obsolete Isocyanate From Mobay Dot S. N. Poison B, Liquid N.O.S.	.18	P,0,6,4	1,6,5,0	P
	9	Obsolete Plasticizer Dot S. N. ORM-A, N. O. S.	1,3	U,0,8,8	4,5,6	P
	10	Obsolete Toluene Dot S. N. Toluene	0,8	D,0,0,1 U,2,2,0	F,0,0,5	3,9,7 P
	11	Obsolete Mek Dot S. N. Methylethyl Ketone	0,8	F,0,0,5 D,0,0,1	7,3,2	P
	12	Obsolete Low Flash Solvents Dot S. N. Paint Reducing Liquid	0,8	D,0,0,1	4,0,2	P

XIV. COMMENTS (enter information by section number—see instructions)

Dot S. N. = Department of Transportation Shipping Name.

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 7 8 7 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 Princeton Avenue
P. O. Box 431
Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental
22077 Mound Road
Warren, Michigan EPA I.D. No. MID 087478574

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Obsolete Mek Dot S. N. Methyl Ethyl Ketone	0 8	D 0 0 1 U 1 5 9	3 6 9	P t0
	2	Obsolete Methyl Isoamyl Ketone Dot S. N. Solvent N.O.S.	0 8	D 0 0 1	3 7 3	P
	3	Obsolete Xylene Dot S. N. Xylene	0 8	D 0 0 1	7 8 9	P
	4	Obsolete Low Flash Solvents Dot S. N. Solvent N.O.S.	0 8	D 0 0 1	1 8 4 3	P
	5	Obsolete Acrylic Reducer Dot S. N. Compound Reducing Liquid	0 8	D 0 0 1	8 0 0	P
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Issue seal here

XIV. COMMENTS (enter information by section number—see instructions)

Dot S. N. = Department of Transportation Shipping Name.

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the Calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

O H D 0 0 7 7 2 2 3 3 6 (1-12)

II. NAME OF INSTALLATION

GMC FISHER BODY DIV EUCLID PLANT (61-97)

III. INSTALLATION MAILING ADDRESS

20001 EUCLID AVENUE (1-45)

Street or P.O. Box

CLEVELAND (1-16) OH 44117 (41-42, 47-51)

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

20001 EUCLID AVENUE (1-45) 18 (47-48)

County Code

EUCLID (1-16) OH 44117 (41-42, 47-51) 2396 (53-56)

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

TINKHAM JOHN (1-25) 216-261-5185 (46-55)

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification number of all hazardous waste transporters whose services were used during the reporting year)

NO HAZARDOUS WASTES WERE SHIPPED DURING 1983.

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Printed/Type Name Title Signature of Authorized Representative Date Signed

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

I certify by facility that all wastes on this page were sent

VIII. GENERATOR'S EPA I.D. NO.

TIAC

OHD097622336

IX. FACILITY'S EPA I.D. NO.

X. FACILITY NAME

XI. FACILITY'S ADDRESS

Street or P.O. Box

City or Town

State Zip Code

XII. WASTE IDENTIFICATION

Line No.	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

20 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 20

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983

FOR AGENCY USE ONLY

FOR AGENCY USE (1-5) L P H W C | CARD TYPE (6-7) 2 0 | TRANS CODE (8) A | DATE ENTERED (9-14) ___ ___ ___

GENERAL INSTRUCTIONS

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.
The information requested in this report is required by Federal and State law.

Please print or type with elite type (12 characters per inch).

I. NON-REGULATED STATUS

Complete this section only if you did not generate hazardous quantities of hazardous waste at any time during the calendar year covered by this report. Enter the one numeric code (1 - 5) that best describes your status during the entire year. See the instructions for definitions of codes and explain in Comment Section.

1 Non-handler
(2) Small Quantity Generator
3 Exempt
4 Beneficial Use
5 Closed

This installation's Non-Regulated Status is expected to apply:

6 For 1983 only, explain in Comment Section.
7 Permanently, explain in Comment Section.
(8) Other, explain in Comment Section.

II. REGULATED STATUS

See instructions for completing this and following sections.

III. GENERATOR'S USEPA I.D. NUMBER (15-26): ILD006231485

IV. GENERATOR'S ILLINOIS I.D. NUMBER (27-38): 0313270001 0

V. NAME OF INSTALLATION:

GENERAL MOTORS OCRPORATION, [redacted]

VI. INSTALLATION MAILING ADDRESS

79th STREET & WILLOW SPRINGS ROAD
Street or P.O. Box

WILLOW SPRINGS, ILLINOIS CHICAGO 60480
City or Town State Zip Code

VII. LOCATION OF INSTALLATION (if different than section VI above):

SAME
Street or Route number

City or Town State Zip Code

VIII. INSTALLATION CONTACT

NEWTON, KENNETH
Name (last and first)

(312) 579-2776
Phone No. (area code & no.)

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Sections 1004 and 1021 (c) (2). Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the violation continues, a fine up to $1,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

CARL E. SISK, PLANT MANAGER
Name and Official Title (type or print) Signature of Author and Representative *Date Signed

5-1-84 - EMAIL WILL MAIL

Page 0 0 1 of 2
(61) (62)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983 (cont

XVI COMMENTS

SECTION I - (2) SMALL QUANTITY GENERATOR:

U226 or 1,1,1-Trichloroethane is the only pure grade commercial chemical in use at our facility. We purchase 1600 kg annually for degreasing maintenance parts. This waste is combined with other spent lubricating oils at our Industrial Waste Treatment Plant (Permit by Rule) and re-refined for reuse.
We generate and/or accumulate less than 1000 kg in any single month.

SECTION I - (8) OTHER:

Although we neither stored (In excess of 90 days) nor disposed of any hazardous waste in 1983, future production changes may require the introduction of hazardous material(s) into our operation.

cc: J. Fannon, W.E.A. (2)

Use one name entry in shaded areas — OMB No. 2050-0024 Expires 12-31-85

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

T A C

F	M	I	D	9	8	0	5	6	8	7	6	0	1	7
1	2												13	14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C300 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

G	M	C		F	I	S	H	E	R		B	O	D	Y		D	I	V	I	S	I	O	N		P	L	A	N	T	#	3	7				
30																																				69

IV. INSTALLATION MAILING ADDRESS

3	6	0	5	2		H	A	S	T	I	N	G	S		S	T	R	E	E	T																
15	16																																			45

Street or P.O. Box

4	D	E	T	R	O	I	T																					M	I	4	8	2	1	1	1
15	16																											41	42	47					51

City or Town — State — Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5	9	5	0		E		M	I	L	L	W	A	U	K	E	E		S	T	R	E	E	T												
15	16																																			45

Street or Route number

6	D	E	T	R	O	I	T																					M	I	4	8	2	1	1	1
15	16																											41	42	47					51

City or Town — State — Zip Code

VI. INSTALLATION CONTACT

2	J	O	H	N	S	O	N	,		V	E	R	N	E	L	L		W																	
15	16																																			45

Name (last and first)

3	1	3	-	5	5	6	-	0	9	3	7
40											55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Carl Pearson	Plant Manager	Carl Pearson	2/16/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8750-12A(5-80) (Revised 11-83)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 9 8 0 5 6 8 7 6 0 (TAC) 1 1

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM - MET

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, Michigan 48192

XII. TRANSPORTATION SERVICES USED

Own Commercial Vehicle

XIII. WASTE IDENTIFICATION

Sequence #	Item #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Methylene Chloride	0 2	U 0 8 0	1 9 0	P
	2	Waste Paint & Paint Thinner	0 7	U 2 2 0 U 2 3 9 F 0 1 7	2 3 7 6	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C
MIT|D|0|5|6|8|7|6|0|C|1|1|
1 2 13 14 15

X. FACILITY'S EPA I.D. NO.

MIT|D|0|5|7|0|0|2|6|0|2|
16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

XI. FACILITY ADDRESS

27140 Princeton
P.O. Box 431
Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Own Commercial Vehicle

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Waste Water-Oil Coolant Waste Oil	N A 33 34	35 38 39 42 43 46 47 50	5280 51 59	P 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make marks in shaded areas. OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with ohh type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

CMS ID # (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

TAC

T|M|I|D|0|0|5|3|5|6|7|4|6|E|1|1|
1 2 13 14 15

III. NAME OF INSTALLATION

G|M|C| |F|I|S|H|E|R| |B|O|D|Y| |D|I|V|I|S|I|O|N| |P|L|A|N|T| |#|4|0|
30 69

IV. INSTALLATION MAILING ADDRESS

3|6|0|5|1| |H|A|S|T|I|N|G|S| |S|T|R|E|E|T|
15 16 45

Street or P.O. Box

4|D|E|T|R|O|I|T| | | | | | | | | | | | | | | | | | | | | | | M|I|4|8|2|1|1|
15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5|1|5|0|0| | |F|E|R|R|Y| |S|T|R|E|E|T| | | | | | | | | | | | | | | | | | | |

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

M I T I 0 0 0 5 3 2 6 7 4 6 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM - MET

X. FACILITY'S EPA I.D. NO.

M I T I 0 0 0 6 0 6 3 1 0 4

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, Michigan 48192

XII. TRANSPORTATION SERVICES USED

Own Commercial Vehicle

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste Paint & Paint Thinner	0 7	U 2 2 0 U 2 3 9 P 0 1 4	3 0 6 0	P
	2	Poly-urethane	1 0	U 2 2 3	5 2 8	P
	3	Hardener/Resin/Glue Sludge	1 0	U 1 0 7 U 2 2 3	2 3 7 6	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

COMMENTS (enter information by section number—see instructions)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

20 GENERATOR ANNUAL HAZARDOUS WASTE REPORT 20

This report is for the calendar year ending December 31, 1983

FOR AGENCY USE ONLY

FOR AGENCY USE (L,P,M,W,C) (1–5) CARD TYPE (20) (6–7) TRANS CODE (A) (8) DATE ENTERED (9–14)

GENERAL INSTRUCTIONS

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.
The information requested in this report is required by Federal and State law.

Please print/type with elite type (12 characters per inch)

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the calendar year covered by this report. Circle the one numeric code, 1 thru 5, that best describes your status during the entire year, see instructions for explanation of codes, and explain in Comment Section.

(1) Non-handler
(2) Small Quantity Generator
(3) Exempt
(4) Beneficial Use
(5) Closed

This installation's Non-Regulated Status is expected to apply:

(6) For 1983 only, explain in Comment Section.
(7) Permanently, explain in Comment Section.
(8) Other, explain in Comment Section.

II. REGULATED STATUS

See instructions for completing this and following sections.

III. GENERATOR'S USEPA I.D. NUMBER (15–26): I L D 0 0 4 2 3 1 4 8 5

IV. GENERATOR'S ILLINOIS I.D. NUMBER (27–38): 0 3 1 3 2 7 0 0 0 1 0

V. NAME OF INSTALLATION

GENERAL MOTORS CORPORATION, FISHER BODY DIVISION

VI. INSTALLATION MAILING ADDRESS

79th STREET & WILLOW SPRINGS ROAD
Street or P.O. Box

WILLOW SPRINGS, ILLINOIS — 60480
City or Town — State — Zip Code

VII. LOCATION OF INSTALLATION (if different than section VI above)

SAME
Street or Route number

City or Town — State — Zip Code

VIII. INSTALLATION CONTACT

NEWTON, KENNETH
Name: last and first

(312) 579-2776
Phone No.: area code & no.

The Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Sections 1004 and 1021 1/2. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues, a fine up to $10,000/month and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

CARL E. SISK, PLANT MANAGER
Print or Type Name — Title — Signature of Authorized Representative — Date Signed

Page 0 0 1 of 2

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983 (cont.)

XVI. COMMENTS

SECTION I - (2) SMALL QUANTITY GENERATOR:

U226 or 1,1,1-Trichloroethane is the only pure grade commercial chemical in use at our facility. We purchase 1600 kg annually for degreasing maintenance parts. This waste is combined with other spent lubricating oils at our Industrial Waste Treatment Plant (Permit by Rule) and re-refined for reuse.
We generate and/or accumulate less than 1000 kg in any single month.

SECTION I - (8) OTHER:

Although we neither stored (In excess of 90 days) nor disposed of any hazardous waste in 1983, future production changes may require the introduction of hazardous material(s) into our operation.

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-8

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T A C

F	M	I	D	9	8	0	5	6	8	6	4	6		1
1	2											13	14	15

III. NAME OF INSTALLATION

G	M	C		F	I	S	H	E	R		B	O	D	Y		D	I	V	I	S	I	O	N		P	L	A	N	T		#	2	1							
30																																							69

IV. INSTALLATION MAILING ADDRESS

3	6	0	5	1		H	A	S	T	I	N	G	S		S	T	R	E	E	T																					
15	16																																							45		

Street or P.O. Box

4	D	E	T	R	O	I	T																							M	I	4	8	2	1	1
15	16																													41	42	47				51

City or Town — State — Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5																																								
15	16																																						45		

Street or Route number

6																																									
15	16																													41	42	47				51				

City or Town, — State — Zip Code

VI. INSTALLATION CONTACT

2	J	O	H	N	S	O	N	,		V	E	R	N	E	L	L		W																							
15	16																																							45		

Name (last and first)

3	1	3	-	5	5	6	-	0	9	3	7
46											55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Carl Pearson	Plant Manager	Carl Pearson	2/16/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] MI TI DI 9i 8i 0i 5i 6i 8i 6i 4i 6 [redacted] T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM - MET

X. FACILITY'S EPA I.D. NO.

[redacted] MI TI DI 0i 9i 6i 9i 6i 3i 1i 9i 4i

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, Michigan 48192

XII. TRANSPORTATION SERVICES USED

Own Commercial Vehicle

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste Paint & Paint Thinner	07	U220 U239 D001	72240	P
	2	Adhesives & Sealers	07	K014 K015	22800	P
	3	Petroleum Distillate	01	F001	12140	P
	4	Caustic Sodium	02	F010	6336	P
	5	Methylene Chloride	02	U080	240	P
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

T/A C
M I D 9 8 0 5 6 8 6 4 6 7 1 1
1 2 13 14 15

X. FACILITY'S EPA I.D. NO.

M I T N 0 9 6 3 1 1 9 W
16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM - MET

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, Michigan 48192

XII. TRANSPORTATION SERVICES USED

PASU SELLERS MID980793350
18530 Allen Road
Wyandotte, Michigan 48192

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
25 32	1	Caustic Sodium	07	B106D002 (35 38 39 42)	5138 (51 59)	P (60)
	2	Waste Paint & Paint Thinner	07	U220U239 / F017	26136	P
	3	Methylene Chloride	02	U080	418	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

M I D 9 8 0 5 6 9 6 4 6 (1 1)

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2

16 28

XI. FACILITY ADDRESS

27140 Princeton, P.O. Box 431
Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Own Commercial Vehicle

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Re-cyclable: Water-Oil Coolant & Waste Oil	N/A 33 34	35 38 39 42 43 46 47 50	51 1 2 1 6 8 0 59	P 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

F|O|H|D|0|0|4|8|5|4|3|5|5|9|

1 2 13 14 15

II. NAME OF INSTALLATION

F|I|S|H|E|R| |B|O|D|Y| |H|A|M|I|L|T|O|N| |P|L|A|N|T| |D|I|V| |G|M|C| | | |

30 47

III. INSTALLATION MAILING ADDRESS

3|4|4|0|0| |D|I|X|I|E| |H|I|G|H|W|A|Y| | | | | | | | | | | | | | | | |

15 16 45

Street or P.O. Box

H|A|M|I|L|T|O|N| | | | | | | | | | | | | | | | |O|H|4|5|0|1|2|

15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

3|4|4|0|0| |D|I|X|I|E| |H|I|G|H|W|A|Y| | | | | | | | | | | | | | | | |

15 16 45

0|9|

47 48

County Code

B|F|A|I|R|F|I|E|L|D| | | | | | | | | | | | | | | | |O|H|4|5|0|1|4|

15 16 41 42 47 51

City or Town State Zip Code

8|4|1|6|5|

53 56

Primary SIC Code

V. INSTALLATION CONTACT

Z|G|R|E|G|N| |E|V|G|E|M|E| |R| | | | | | | | | | | | | | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C O H D 0 0 4 2 5 4 3 5 5 | 2

IX. FACILITY'S EPA I.D. NO.

O H D 0 8 7 4 3 3 7 4 4

X. FACILITY NAME

C B C O S C B R C O M P A N Y

XI. FACILITY'S ADDRESS

5 0 9 2 A B E R R O A D

Street or P.O. Box

W I L L A M S B U R G | O H 4 5 1 7 6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Zinc Rich Primer	08	D001	78338	P
2	Mortell Sound Deadner	08	D001	11853 7	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. UNITS (enter information for all line numbers)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

F	H	D	0	0	4	2	5	4	3	5	5	1	7
1	2									13	14	15	

II. NAME OF INSTALLATION

F	I	S	H	E	R		B	O	D	Y		M	A	N	U	F	A	C	T	U	R	I	N	G		P	L	A	N	T		D	I	V		G	M	C					
30																																										67

III. INSTALLATION MAILING ADDRESS

| 3 | 4 | 4 | 0 | 0 | | D | I | X | I | E | | N | I | G | H | W | A | Y | | | | | | | | | | | | | | | | | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C I O N I D 0 1 0 4 2 5 4 3 5 5 1 2 1

1 2 13 14 15

IX. FACILITY'S EPA I.D. NO.

I N I D 0 9 3 2 1 9 0 1 2

16 27

X. FACILITY NAME

I L W I N C

28 59

XI. FACILITY'S ADDRESS

9 9 0 1 N M O R R I S S T R E E T

28

Street or P.O. Box

I N D I A N A P O L I S I N D I A N A

38

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS		C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Perilton Carbonizing Meta Part Cyanide	1	2	P 1 3 1 0	1 9 0 1 0 1 0	F
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

XIII. COMMENTS (enter information by line item number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code. _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

(1-12) F|I|O|H|D|0|0|4|2|5|4|3|5|5 (13-15)

II. NAME OF INSTALLATION

(16-30) F|I|S|H|E|R| |B|O|D|Y| |N|A|M|I|L|T|O|N| |P|L|A|N|T| |D|I|V| |G|M|C| (31-47)

III. INSTALLATION MAILING ADDRESS

(48-63) 3|4|0|0| |D|I|X|I|E| |H|I|G|H|W|A|Y| (64-80)

Street or P.O. Box

(81-96) H|A|M|I|L|T|O|N| (97-98) O|H| (99-103) 4|5|0|1|2| (104-111)

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

(112-127) 5|4|0|0| |D|I|X|I|E| |H|I|G|H|W|A|Y| (128-144) (145-146) 0|9| (147-148)

County Code

(149-164) F|A|I|R|F|I|E|L|D| (165-176) O|H| (177-181) 4|5|0|1|4| (182-183) 3|4|6|5| (184-187)

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

(188-203) G|R|E|N| |E|U|G|E|N|E| |R| (204-216) 5|1|3|-|8|9|6|-|2|3|4|0| (217-220)

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all hazardous waste transporters whose service was used during the reporting year.)

OHD 980681670 Hazardous Materials Transport

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

K.D. Shinn	Plant Manager		1/24/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA 8010 Page 1 of 6

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C|O|H|D|0|0|4|2|5|4|3|5|5| |2|

IX. FACILITY'S EPA I.D. NO.

O|H|D|0|8|7|4|3|3|7|4|4|

X. FACILITY NAME

C|E|C|O|S| |C|&|S| |C|O|M|P|A|N|Y|

XI. FACILITY'S ADDRESS

5|0|9|2| |A|B|E|R| |R|O|A|D|

Street or P.O. Box

W|I|L|L|I|A|M|S|B|U|R|G| |O|H|4|5|1|7|6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS		C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Cyanide Contaminated Solid Waste	1	2	P|0|8|0	8|5|6|0	P
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

XIII. COMMENTS (enter information by wa from number)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

M E D 0 0 5 5 5 6 8 6 0 4 1 2

(1 2 13 14 15)

III. NAME OF INSTALLATION

GMC-FISHER BODY DIV. FLINT CONSOLE PLT. NO. 1

(30 69)

IV. INSTALLATION MAILING ADDRESS

3 1 6 5 E COLDWATER RD

(15 16 45)

Street or P.O. Box

F L I N T M I 4 8 5 5 9

(15 16 41 42 47 51)

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(15 16 45)

Street or Route number

(15 16 41 42 47 51)

City or Town State Zip Code

VI. INSTALLATION CONTACT

F O C K L E R, D U T E N V I R. E N G.

(15 16 45)

Name (last and first)

3 1 3 - 7 7 5 - 4 9 8 3

(46 55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

FOR ROBERT W. DECELLE PLANT MANAGER 2-27-84

Print/Type Name Title Signature of Authorized Representative Date Signed

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

MIDO053566660

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

NELSON INDUSTRIAL SERVICE

X. FACILITY'S EPA I.D. NO.

MIDO980111992

XI. FACILITY ADDRESS

12345 SCHAEFER HWY.
DETROIT, MICHIGAN 48227

XII. TRANSPORTATION SERVICES USED

NELSON INDUSTRIAL SERVICE - MID 980111992

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	CYANIDE FILTER PAPERS - DRY - USED IN CHROME PLATING PROCESS	18	D003	8800	P
2	NICKEL FILTER PAPERS - DRY - USED IN CHROME PLATING PROCESS	15	F008	12800	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number--see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MID 005356810

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ORGANIC CHEMICAL CO.

X. FACILITY'S EPA I.D. NO.

MED 990858003

XI. FACILITY ADDRESS

3291 CHICAGO ROAD
GRANDVILLE, MICH. 49418

XII. TRANSPORTATION SERVICES USED

SPARTAN CHEMICAL CO. - MID 079308125

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	SPENT PAINT THINNING COMPOUND	08	F003	14850	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MID 005356860

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CECOS / CER COMPANY

X. FACILITY'S EPA I.D. NO.

OHD 087433744

XI. FACILITY ADDRESS

5091 ACER ROAD
WILLIAMSBURG, OHIO 45176

XII. TRANSPORTATION SERVICES USED

A-1 DISPOSAL CORPORATION - MID 005969452

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. (DOT Hazard code)	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	SOLVENT BASED ADHESIVE SLUDGE DRY H/L #1	08	D001	2 1 6 6 0 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not write in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MIDO65356860 (FAC: T)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES

X. FACILITY'S EPA I.D. NO.

MIED096963194

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MICH. 48192

XII. TRANSPORTATION SERVICES USED

A-1 DISPOSAL CORPORATION - MID 059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	RESIN BOOTH SLUDGE DRY M/L #1	1.5	D001	180900	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear and Incr

XIV. COMMENTS (enter information by section number—see instructions)

47-15 17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 5

(2) ☒ GENERATOR EPA ID NUMBER [redacted] OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME GMC Fisher Body Division

STREET 1000 Town Line Road

CITY Syracuse STATE New York ZIP CODE 13221

(3) ☐ TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. ___ - ___

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [redacted]

NAME SCA Chemical Services

STREET 1550 Balmer Road

CITY Model City STATE New York ZIP CODE 14107

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE	
Waste Polychlorinated Biphenyl	B 0 0 2	0 1	S 0 2	4 7 8	0 4	0 2	✓
Waste Polychlorinated Biphenyl	B 0 0 5	0 2	D 8 1	6 6	0 4	0 2	✓

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME R. F. Link TITLE Plant Manager

SIGNATURE DATE

47-15-17 (12/83)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 5

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME: GMC Fisher Body Division
STREET: 1000 Town Line Road
CITY: Syracuse STATE: New York ZIP CODE: 13221

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] - [ ]

NAME:
STREET:
CITY: STATE: ZIP CODE:

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER: NYD 010 180 145 6 9 9 3 5 NYSDEC Facility I.D. No. [ ]

NAME: Norlite Corporation
STREET: 628 S. Saratoga Ave.
CITY: Cohoes STATE: New York ZIP CODE: 12047

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(9b) UNITS	(11) ON-OFF SITE
Waste Compound: Paints,	F003	01	T07	10	04	02
Thinners and Reducers	D220					
	D239					

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME: R. F. Link TITLE: Plant Manager

SIGNATURE: DATE:

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No 3 of 5

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME GMC Fisher Body Division
STREET 1000 Town Line Road
CITY Syracuse STATE New York ZIP CODE 13221

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No [ ] [ ]
NAME
STREET
CITY STATE ZIP CODE

16 TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER N|Y|D|0|1|8|0|3|3|6|2|4|1 NYSDEC Facility I.D. No
NAME CECOS International
STREET 4624 Royal Avenue
CITY Niagara Falls STATE New York ZIP CODE 14302

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Kolene and Paint Sludge	D002	02	D81	16	04	02

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME R. F. Link TITLE Plant Manager
SIGNATURE DATE

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No 4 of 5

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME GMC Fisher Body Division

STREET 1000 Town Line Road

CITY Syracuse STATE New York ZIP CODE 13221

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No [ ] – [ ]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER A R 4 D 0 1 6 1 9 1 7 4 1 8 1 3 1 9 1 2 NYSDEC Facility I D No [ ]

NAME ENSCO, Inc.

STREET American Road

CITY Eldorado STATE Arkansas ZIP CODE 71730

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Polychlorinated biphenyl	B 0 0 7	0 2	T 0 7	3 2 0	0 3	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME R. F. Link TITLE Plant Manager

SIGNATURE DATE

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No 5 of 5

(2) [X] GENERATOR EPA ID NUMBER [redacted]2|2|3|9|4|4|0 OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME GMC Fisher Body Division
STREET 1000 Town Line Road
CITY Syracuse STATE New York ZIP CODE 13221

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER N|Y|D|0|2|2|3|9|4|4|0 NYSDEC Facility I.D. No
NAME GMC Fisher Body Division
STREET 1000 Town Line Road
CITY Syracuse STATE New York ZIP CODE 13221

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Polychlorinated biphenyls	B|0|0|2	0|1	S|0|2	27	0|4	0|1
Waste Polychlorinated biphenyls	B|0|0|2	0|1	S|0|1	388	0|4	0|1
Waste Polychlorinated biphenyls	B|0|0|5	0|2	S|0|1	13	0|4	0|1
Waste Polychlorinated biphenyls	B|0|0|2	0|1	T|2|9		0|4	0|1

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME R. F. Link TITLE Plant Manager
SIGNATURE DATE

Do not make entries in this area — Form 12-31-83

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
(3) Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

F M I D 0 0 6 0 2 0 4 0 8 1
1 2 13 14 15

1303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

G I C F I S H E R B O D Y D I V G R M E T A L F A B P L A N T
30 69

IV. INSTALLATION MAILING ADDRESS

3 3 0 0 3 6 T H S T. S W
15 16 45
Street or P.O. Box

4 G R A N D R A P I D S M I 4 9 5 0 8
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5
15 16 45
Street or Route number

6
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

7 M E R L I N A L P E T Z O L D
15 16 45
Name (last and first)

6 1 6 — 2 4 7 — 5 4 7 0
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify, under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

H. W. Kruse - Plant Manager

Print/Type Name | Title | Signature of Authorized Representative | Date Signed

EPA Form 8700-13A/7-80 Revised 11-83

Tear out here

Do not make entries in shaded areas — OMB #: 2050-0024 Expires 12-31-8

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

(1) F M I D 0 0 5 3 5 6 7 3 8 (13)

EDP ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

(30) G M C F I S H E R B O D Y D I V I S I O N P L A N T (69)

IV. INSTALLATION MAILING ADDRESS

(15) 3 4 3 0 0 S O U T H S A G I N A W S T R E E T (45)

Street or P.O. Box

(15) F L I N T (41) M I (42) 4 8 5 0 7 (51)

City or Town — State — Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(15) (45)

Street or Route number

(15) (41) (42) (47) (51)

City or Town — State — Zip Code

VI. INSTALLATION CONTACT

(15) V E R N O N E L M E R (45)

Name (last and first)

(46) 3 1 3 — 7 6 6 — 2 0 2 0 (55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

ROBERT A. HAMEISTER - Plant Manager — 2-17-84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Tear out here

FEB 24 RECD

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I D 0 0 5 3 5 6 7 3 8 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Glasurit American, Inc.

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 0 7 1 3 8 7 4 6

XI. FACILITY ADDRESS

3301 Bourke St.
Detroit, MI 48238

XII. TRANSPORTATION SERVICES USED

Drury Brothers
11950 E. Newburgh Rd.
Durand, MI 48429 MID056988892

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Compounds, lacquer, paint, varnish, reducing or thinning liquid.	0 7	D 0 0 1	1 6 2 5 0	G
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

[redacted]

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I D 0 0 5 3 5 6 7 3 8 [redacted]
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal Inc.

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 4 8 0 9 0 6 3 3
16 28

XI. FACILITY ADDRESS

49350 N. Service Rd.
Belleville, MI 48111

XII. TRANSPORTATION SERVICES USED

Valley Services Inc.
P.O. Box 7073
Flint, MI MIT 270010432

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Hazardous Waste Solids N.O.S.	1 5 (33 34)	P 0 0 6 (35 38 39 42 43 46 47 50)	2 5 (51 59)	T (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I D 0 0 5 3 5 6 7 3 8 [redacted]
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Michigan Disposal Inc.

X. FACILITY'S EPA I.D. NO.

M I D 0 0 0 7 2 4 8 3 1
16 28

XI. FACILITY ADDRESS

49350 N. Service Drive
Belleville, MI

XII. TRANSPORTATION SERVICES USED

Valley Services Inc.
P.O. Box 7073
Flint, MI MIT 270010432

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Hazardous Waste solids N.O.S.	1 5	F 0 0 5	3 0 6	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I D 0 0 5 3 5 6 7 3 8 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control, Inc.

X. FACILITY'S EPA I.D. NO.

M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

P.O. Box 431
27140 Princeton Avenue
Inkster, MI 48141

XII. TRANSPORTATION SERVICES USED

Environmental Waste Control, Inc.
P.O. Box 431
27140 Princeton Avenue
Inkster, MI 48141 MID 057002602

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. RCRA Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	Unit of Measure
	1	Waste Cement liquids, N.O.S.	0 7	D 0 0 1	6 4 5 0	G
	2	Waste compound, lacquer, paint, varnish, removing, reducing or thinning liquid.	0 7	D 0 0 1	1 0 7 0	G
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

[redacted]

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I D 0 0 5 3 5 6 7 3 8 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Ionoklad Corporation

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

24671 N. Telegraph Rd.
Southfield, MI 48034

XII. TRANSPORTATION SERVICES USED

Stock Brothers Corp, Great Lakes Environmental Div.
22077 Mound Rd.
Warren, MI 48091 MID 087478574

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Paint, enamel, lacquer, stain, etc. (Zinc Primer)	0 7	D 0 0 1	1 3 2 0	G
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Page of

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C

M I D 0 0 5 3 5 6 7 3 8

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control, Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

P.O. Box 431
27140 Princeton Avenue
Inkster, MI 48141

XII. TRANSPORTATION SERVICES USED

Drury Brothers
11950 E. Newburgh Rd.
Durand, MI 48429 MID 056988892

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Waste Cement Liquid, N.O.S.	07	D001	2400	G
	2					
	3	Waste Compound, lacquer, paint, varnish, removing, reducing or	07	D001	120	G
	4	thinning liquid.				
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T A C
M I D 0 0 5 3 5 6 7 3 8 1 1
1 2 13 14 15

X. FACILITY'S EPA I.D. NO.

M I D 0 0 5 6 2 3 3 8 5
16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

U. S. Chemical Company

XI. FACILITY ADDRESS

29163 Callahan St.
Roseville, MI

XII. TRANSPORTATION SERVICES USED

U.S. Chemical Co.
29163 Callahan St.
Roseville, MI MID005623385

XIII. WASTE IDENTIFICATION

Sequence #	B. Type	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
20 22	1	Compounds, lacquer, paint, varnish, removing, reducing or thinning liquid.	0 7	D 0 0 1 35 38 39 42	9 4 7 5 0 43 47	G 50
	2					
	3	Waste Halogenated Solvents				
	4	(Trichloroethane)	1 3	F 0 0 1	5 0 0	G
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C | M | I | D | 0 | 5 | 3 | 5 | 6 | 7 | 3 | 8 | T/A C | 1 |
1 2 13 14 15

X. FACILITY'S EPA I.D. NO.

F | M | I | D | 0 | 4 | 8 | 0 | 9 | 0 | 6 | 3 |
16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal, Inc.

XI. FACILITY ADDRESS

49350 N. Service Drive
Belleville, MI 48111

XII. TRANSPORTATION SERVICES USED

Granger Container Service
3515 Wood St.
Lansing, MI 48906 MID053322772

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Hazardous Waste Solids N.O.S.	1, 5 33 34	F, 0, 0, 6 35 38 39 42 43 46 47 50	8 51 59	T 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983

I. GENERATOR'S EPA I.D. NUMBER

MSD08466367

II. NAME OF INSTALLATION

GMC Packard Electric Division Brookhaven Plant

III. INSTALLATION MAILING ADDRESS - Divisional Offices

P. O. Box 431
Street or P. O. Box

Warren	Ohio	44486
City or Town	State	Zip Code

IV. LOCATION OF FACILITY (if different than section III above)

Industrial Park Road
Street or Route number

Brookhaven	MS	39601
City or Town	State	Zip Code

V. INSTALLATION CONTACT

Games, Bill
Name (last and first)

(601) 833-0219 Bill Jones 8 ~~#3~~ 727 1219
Phone No. (area code & no.)

VI. CERTIFICATION Hamilton, Bush

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Glenn D. Reeser	Director, MS Operations	[signature]	2/27/84
Print/Type Name	Title	Signature of Authorized Representative	Date

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (CONT.)

This report is for the calendar year ending December 31, 1983

VII. GENERATOR'S EPA I.D. NO.

MSD08466367

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

IX. FACILITY'S EPA I.D. NO.

*

X. FACILITY ADDRESS

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during the reporting period. This section to be completed only once. Do not repeat on supplemental sheets.)

XII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number - see instructions)

* No regulated hazardous wastes were disposed of from our facility in 1983.

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983

I. GENERATOR'S EPA I.D. NUMBER

MSD065462517

II. NAME OF INSTALLATION

GMC Packard Electric Clinton Plants

III. INSTALLATION MAILING ADDRESS - Divisional Offices

P. O. Box 431
Street or P. O. Box

Warren — Ohio — 44486
City or Town — State — Zip Code

IV. LOCATION OF FACILITY (if different than section III above)

Clinton Industrial Park Drive
Street or Route number

Clinton — MS — 39056
City or Town — State — Zip Code

V. INSTALLATION CONTACT

Pickens, Ivon
Name (last and first)

(601) 924-7278 8757 1322 Was Lapsed
Phone No. (area code & no.)

VI. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Glenn D. Reeser — Director, MS Operations — [signature] — 2/27/84
Print/Type Name — Title — Signature of Authorized Representative — Date

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (CONT.)

This report is for the calendar year ending December 31, 1983

VII. GENERATOR'S EPA I.D. NO.

MSD065462517

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

IX. FACILITY'S EPA I.D. NO.

*

X. FACILITY ADDRESS

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during the reporting period. This section to be completed only once. Do not repeat on supplemental sheets.)

XII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number - see instructions)

* No regulated hazardous wastes were disposed of from our facility in 1983.

42-590 O—85——53

Do not make entries in shaded areas

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

MIDS807008761
1 2 13 14 15

☐ CBI03 ENTRY (OFFICIAL USE ONLY)

III. NAME OF INSTALLATION

GMC FISHER BODY FLEETWOOD
30 69

IV. INSTALLATION MAILING ADDRESS

3 WEST FORT ST / WEST END AVE
15 16 45
Street or P.O. Box

4 DETROIT MI 48209
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5
15 16 45
Street or Route number

6
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

2 KANDER SANDRA
15 16 45
Name (last and first)

313-354-7248
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

T.E. CLIFFORD PLANT MANAGER Carl H Kander 2-29-84
Print/Type Name Title Signature of Authorized Representative FOR T.E. CLIFFORD Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 9 8 0 7 0 0 8 7 6 | 1 | 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WOODLAND MEADOWS

X. FACILITY'S EPA I.D. NO.

M I D 0 0 0 8 1 0 4 6 8

XI. FACILITY ADDRESS

4620 HANNAN RD.
CANTON TOWNSHIP, 48184

XII. TRANSPORTATION SERVICES USED

WASTE MANAGEMENT OF MICHIGAN / WEST
MID 07290546

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	HAZARDOUS WASTE SOLID N.O.S.	1.5	F 0 0 6	2400	G*
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

* AVERAGE DENSITY = 1.3 g/ml.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T A C
C|M|I|D|9|8|0|7|0|0|8|7|6| |1|
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes this page were shipped)

WAYNE DISPOSAL, INC.

X. FACILITY'S EPA I.D. NO.

F|M|I|0|0|4|8|0|9|0|6|3|3|
16 28

XI. FACILITY ADDRESS

49350 N. Service Dr.
BELLEVILLE, MI 48111

XII. TRANSPORTATION SERVICES USED

WASTE MANAGEMENT OF MICHIGAN/WEST
MID 0729O546

XIII. WASTE IDENTIFICATION

Sequence #	Waste #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	HAZARDOUS WASTE SOLID N.O.S.	1.5 33 34	P.O.O.6 35 38 39 42 43 45 46 50	44448 51 59	P 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.
T/A/C
CMI D980700876 (1)
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
CHEMICAL RECOVERY SYSTEMS, INC.

X. FACILITY'S EPA I.D. NO.
FMI D060975844
16 25

XI. FACILITY ADDRESS
36345 VAN BORN RD.
ROMULUS, MI 48174
1 4

XII. TRANSPORTATION SERVICES USED
CHEMICAL RECOVERY SYSTEMS, INC.
MID 060975844

XIII. WASTE IDENTIFICATION

Sequence #	Item #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	PURGE THINNER AND LACQUER MIXTURE FROM PAINT SPRAY OPERATIONS	08	F005 35 38 39 42 / 43 46 47 51	467000 51 59	G* 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

* DENSITY = .91 g/ml

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

C M I D 0 9 8 0 7 0 0 8 7 6 | 1 |

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 9 6 9 6 3 1 9 4

16 28

XI. FACILITY ADDRESS

18550 ALLEN RD.
WYANDOTTE, MI 48192

XII. TRANSPORTATION SERVICES USED

CHEM-MET SERVICES MID 096963194 PAUL O SELLARS CO. MID 000703350
BENTLEY OIL, INC. MID 000718650
K+D INDUSTRIAL SERVICES, INC MID 072790710

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	WASTE PAINT, NOS	0 8 (33 34)	D 0 0 1 (35 38 39 42)	2 7 0 0 5 (43 46 47 50 51 59)	G (60)
	2	WASTE COMPOUND THINNING, NOS	0 8	D 0 0 1	5 6 1 0	G
	3	WASTE XYLENE	0 8	F 0 0 3	5 5 0	G
	4	WASTE OIL, NOS	0 1	D 0 0 1	1 7 0 5	G
	5	WASTE CLEANING COMPOUND NOS	0 2	D 0 0 2	8 8 0	G
	6	WASTE CEMENTS + ADHESIVES	0 2	D 0 0 1	3 1 3 0	G
	7	WASTE SOLVENTS	0 8	D 0 0 1	8 6 9 0	G
	8	WASTE FUEL OIL, DIESEL #2	0 1	D 0 0 1	2 0 0	G
	9	WASTE GASOLINE	0 8	D 0 0 1	1 4 0 0	G
	10	WASTE DICHLOROMETHANE + PAINT MIXTURE - STRIPPING OPER.	1 5	D 0 0 1	5 5 0 0	G
	11	HAZARDOUS WASTE SOLID NOS	1 5	F 0 0 6	1 6 8 0 0	G
	12					

Tear seal here

XIV. COMMENTS (enter information by section number—see instructions)

XIII 1. AVG. DENSITY = 9 LBS/GAL
2. " " = 8 LBS/GAL
3. " " = 7 LBS/GAL
4. " " = 8 LBS/GAL
5. " " = 9 5 LBS/GAL
6. " " = 8 LBS/GAL
7. AVG DENSITY = 6.5 LBS/GAL
8. " " = 7.5 LBS/GAL
9. " " = 9.5 LBS/GAL
10. " " = 11.0 LBS/GAL
11. " " = 9.2 LBS/GAL

5 OF 6

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

TAC

MIDB80700876 | 11
1 2 13 14 15

X. FACILITY'S EPA I.D. NO.

MIDOOO724831
16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL, INC.

XI. FACILITY ADDRESS

49350 N. SERVICE DR.
BELLEVILLE, MI 48111

XII. TRANSPORTATION SERVICES USED

WASTE MANAGEMENT OF MICHIGAN/WEST, MID 072790546

GREAT LAKES WATER BLASTING, INC. MID 087484556

XIII. WASTE IDENTIFICATION

Sequence #		A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No (see instructions)	D. Amount of Waste	E. Units of Measure
29 32	1	HAZARDOUS WASTE SOLID, N.O.S.	1.5 35 36	F006 35 38 39 42	38950 43 50 51 59	G* 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

* DENSITY = APPROX. 1.2 gram/ml

Do not make entries in shaded areas

OMB #: 2050-0024 Expires: 12-31-84

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

JUN 6 DEC 7

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T A L

MIDS807008761 1

1 2 13 14 15

III. NAME OF INSTALLATION

GMC FISHER BODY FLEETWOOD

10 50

IV. INSTALLATION MAILING ADDRESS

3WEST FORT ST / WEST END AVE.

15 16 45

Street or P.O. Box

4DETROIT MI 48207

15 16 41 42 47 51

City or Town State Zip Code

Tear out here

V. LOCATION OF INSTALLATION (if different than section IV above)

5

15 16 45

Street or Route number

6

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

7KAJDER SANDRA

15 16 45

Name (last and first)

8 3 1 3 - 5 5 4 - 7 2 4 8

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

T.E. CLIFFORD PLANT MANAGER

Print/Type Name Title Signature of Authorized Representative Date Signed

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 9 8 0 7 0 0 8 7 6 (TAC) 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WOODLAND MEADOWS

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 0 8 1 0 4 6 8

XI. FACILITY ADDRESS

4620 HANNAN RD.
CANTON TOWNSHIP, 48184

XII. TRANSPORTATION SERVICES USED

WASTE MANAGEMENT OF MICHIGAN / WEST
MID 072950546

XIII. WASTE IDENTIFICATION

Sequence #	No.	A. Description of Waste	B. TOXIC / Hazardous / Acute	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	HAZARDOUS WASTE SOLID N.O.S.	1.5	F 0 0 6	2400	G*
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

* AVERAGE DENSITY = 1.3 g/ml.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

CMI D980700876 (1)

IX. FACILITY NAME (Specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL, INC

X. FACILITY'S EPA I.D. NO.

MID048090633

XI. FACILITY ADDRESS

49350 N. Service Dr
Belleville, MI 48111

XII. TRANSPORTATION SERVICES USED

WASTE MANAGEMENT OF MICHIGAN/WEST
MID 072905 46

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	HAZARDOUS WASTE SOLID N.O.S.	1 5	F C C 6	4444	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear vast here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T A C
MIDO980700876 11
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEMICAL RECOVERY SYSTEMS, INC.

X. FACILITY'S EPA I.D. NO.

MIDO60975844
16 28

XI. FACILITY ADDRESS

36345 VAN BORN RD.
ROMULUS, MI 48174

XII. TRANSPORTATION SERVICES USED

CHEMICAL RECOVERY SYSTEMS, INC.
MID 060875844

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	PURGE THINNER AND LACQUER MIXTURE FROM PAINT SPRAY OPERATIONS	OB	F005	467000	G*
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

* DENSITY = .91 g/ml

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

MI 0 9 8 0 7 0 0 8 7 6 (1) TAC

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES

X. FACILITY'S EPA I.D. NO.

MI 0 0 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN RD.
WYANDOTTE, MI 48192

XII. TRANSPORTATION SERVICES USED

CHEM-MET SERVICES MID 096963194 PAUL O'SHEARE, CO. MID #007033350
BENTLEY OIL, INC. MID 000718650
K+D INDUSTRIAL SERVICES, INC. MID 072790710

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. TSDF Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	WASTE PAINT, NOS	0 8	D 0 0 1	2 7 0 0 5	G
	2	WASTE COMPOUND THINNER, NOS	0 8	D 0 0 1	5 6 1 0	G
	3	WASTE XYLENE	0 8	F 0 0 3	5 5 0	G
	4	WASTE OIL, NOS	0 1	D 0 0 1	1 7 0 5	G
	5	WASTE CLEANING COMPOUND NOS	0 2	D 0 0 2	8 8 0	G
	6	WASTE CEMENTS + ADHESIVES	0 2	D 0 0 1	3 1 3 0	G
	7	WASTE SOLVENTS	0 8	D 0 0 1	8 6 9 0	G
	8	WASTE FUEL OIL, DIESEL #2	0 1	D 0 0 1	2 0 0	G
	9	WASTE GASOLINE	0 8	D 0 0 1	1 4 0 0	G
	10	WASTE DICHLOROMETHANE + PAINT MIXTURE - STRIPPING OPER.	1 5	D 0 0 1	5 5 0 0	G
	11	HAZARDOUS WASTE SOLID NOS	1 5	F 0 0 6	1 6 8 0 0	G
	12					

XIV. COMMENTS (enter information by section number—see instructions)

XIII 1. AVG. DENSITY = 9 LBS/GAL
2. " " = 8 LBS/GAL
3. " " = 7 LBS/GAL
4. " " = 8 LBS/GAL
5. " " = 9.5 LBS/GAL
6. " " = 8 LBS/GAL
7. AVG DENSITY = 6.5 LBS/GAL
8. " " = 7.5 LBS/GAL
9. " " = 9.5 LBS/GAL
10. " " = 11.0 LBS/GAL
11. " " = 9.2 LBS/GAL

5 OF 6

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

GM I D 9 8 0 7 0 0 8 7 6 (TAC 1)

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 0 7 2 4 8 3 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL, INC.

XI. FACILITY ADDRESS

49350 N. SERVICE DR.
BELLEVILLE, MI 48111

XII. TRANSPORTATION SERVICES USED

WASTE MANAGEMENT OF MICHIGAN/WEST, MID 072790546

GREAT LAKES WATER BLASTING, INC. MID 087484556

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	HAZARDOUS WASTE SOLID, N.O.S.	1 5	F 0 0 6	3 8 9 5 0	G*
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

* DENSITY = APPROX. 3.2 gram/ml

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

Tear out here

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T/A C

M I D 0 0 1 8 7 6 6 1 3
1 2 13 14 15

III. NAME OF INSTALLATION

FISHER BODY DIV. - KALAMAZOO PLANT - GMC
30 69

IV. INSTALLATION MAILING ADDRESS

5200 EAST CORK STREET
15 16 45
Street or P.O. Box

KALAMAZOO MI 49002
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 45
Street or Route number

15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

BOAZ, BARRY ENV.
15 16 45
Name (last and first)

616-383-1041
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

John B. McGuire

Title MFG ENGR Signature of Authorized Representative Date 3/29/84

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 0 1 1 8 7 1 6 1 6 1 3 (I/A/C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CROSS/CER COMPANY

X. FACILITY'S EPA I.D. NO.

F O H D 0 1 8 7 1 4 1 3 1 7 4 1 4

XI. FACILITY ADDRESS

5092 ABER RD.
WILLIAMSBURG, OHIO
45176

XII. TRANSPORTATION SERVICES USED

MID 059695452

A-1 DISPOSAL CORP.
400 BROAD ST.
PLAINWELL, MI. 49080

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	WASTE ADHESIVE	0 9	D 0 0 1	1 2 0 0 0 0	K
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 1 0 1 3 8 1 7 1 6 1 6 1 3 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I D 0 1 9 1 6 1 9 1 6 1 3 1 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI.
48192

XII. TRANSPORTATION SERVICES USED

CHEM MET - MID -096063194
(SAME ADDRESS AS ITEM #XI

PAUL O. SELLARS - MID 980793350
18530 ALLEN RD., WYANDOTTE, MI 48192

A-1 DISPOSAL CORP. - MID059695452
400 BROAD ST, PLAINWELL, MI. 49080

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	WASTE ZINC SLUDGE	1 5	D 0 0 1	1 2 6 0 6 0	K
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make any entries above this line

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C
M I D 0 0 0 3 1 8 7 6 6 6 3
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WASTE RESEARCH & RECLAIMATION

X. FACILITY'S EPA I.D. NO.

W I D 9 9 0 8 2 9 4 7 5
16 28

XI. FACILITY ADDRESS

ROUTE 7
EAU CLAIRE, WISCONSIN

XII. TRANSPORTATION SERVICES USED

MID047173653

ASHLAND CHEMICAL CO.
1800 GLEN ROSE AVE.
LANSING, MI. 48916

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard code (31 34)	C. EPA Hazardous Waste No. (see instructions) (35 38 / 39 42 / 43 46 / 47 50)	D. Amount of Waste (51 59)	E. Unit of Measure (60)
1	PAINT THINNER (RECLAIMABLE)	0 1 8	F 0 0 3	1 4 0 0	K
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 1 8 7 6 6 6 3 [redacted] T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped) MANUFACTURER:

W.C. RICHARDS CO.

X. FACILITY'S EPA I.D. NO.

I L D 0 0 1 7 5 4 1 6 7

XI. FACILITY ADDRESS

3555 WEST 123rd ST.
BLUE ISLAND, ILL. 60406

XII. TRANSPORTATION SERVICES USED

BLUE ARROW DOUGLAS INC.
5541 KING. HWY.
KALAMAZOO, MI. 49001

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	ZINC RICH PRIMER RETURNED FOR RECYCLING	08	D008	18651.2	K
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

JUN 2 - RECD

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

1 AC

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
F	O	H	D	0	0	4	2	6	0	0	8	9		

II. NAME OF INSTALLATION

| 10 | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(Use this facility if you have had a previous facility with this EPA ID number)

VIII. GENERATOR'S EPA I.D. NO.

C	O	H	D	0	0	4	2	6	0	0	8	9		2

IX. FACILITY'S EPA I.D. NO.

O	H	D	0	8	7	4	3	3	7	4	4	

X. FACILITY NAME

C E C O S I N T E R N A T I O N A L I N C

XI. FACILITY'S ADDRESS

5 0 9 2 A B E R R D

Street or P.O. Box

W I L L I A M S B U R G O H 4 5 1 7 6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

Line Code	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTE WATER TREATMENT SLUDGE	1 2	F 0 0 6	6 0 6	T
2	WASTE FLAMMABLE SOLID	0 8	D 0 0 1	6 7 8 3	P
3	LEAD SLUDGE	1 2	D 0 0 8	1 4 2 8	P
4	CHROMIC SLUDGE	1 2	D 0 0 7	1 4 2 8 4	P
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/RC

G | O | H | D | 0 | 0 | 4 | 2 | 6 | 0 | 0 | 8 | 9 | | 2 |

IX. FACILITY'S EPA I.D. NO.

M | I | D | 0 | 6 | 0 | 9 | 7 | 5 | 8 | 4 | 4

X. FACILITY NAME

C | H | E | M | I | C | A | L | | R | E | C | O | V | E | R | Y | | S | Y | S | T | E | M | S | | I | N | C

XI. FACILITY'S ADDRESS

3 | 6 | 3 | 4 | 5 | | V | A | N | | B | O | R | N | | R | D

Street or P.O. Box

R | O | M | U | L | U | S

City or Town

M | I | 4 | 8 | 1 | 7 | 4

State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	SPENT SOLVENT FLAM.	07	F003	434.4	T
2	MIXED CHLORINATED	01	F001	13.5	T
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

SPENT SOLVENT = 115750 GAL. x 7.5 LBS/GAL. ÷ 2000 Lbs/Ton = 434.1 tons
MIX CHLORINATED = 3600 GAL. x 7.5 LBS/GAL. ÷ 2000 Lbs/Ton = 13.5 tons
BOTH MATERIALS ARE RECYCLED AND USED

JUN 29 RECD

GENERATOR ANNUAL HAZARDOUS WASTE REPORT
WISCONSIN STATUTES 144

Reporting Period: January 1, 1983 - December 31, 1983

Please complete all applicable portions of this form and return it to the appropriate District office indicated on the attached map.

WID059980045 1 54 01 L
GENERAL MOTORS CORP.-ASSEMBLY DIVIS
1000 INDUSTRIAL AVENUE
JANESVILLE WI 53545

EPA ID Number: WID059980045
Facility Name: GM Assembly
Contact Person: Mike Merrick
Mailing Address: 1000 Industrial Ave.
Mailing City: Janesville
Location Address: Same
County: Rock
Telephone Number: 608-756-7686

1. How much hazardous waste did you actually have at your facility site on January 1, 1983? 26,800.0 pounds

2. What is the total amount of hazardous waste originally generated at your facility during the reporting period? (Include only wastes actually created by your manufacturing processes or use of materials. Exclude wastes received from others and wastes coming from your hazardous waste treatment process or storage operations.) 16,948,649.4 pounds

3. What is the total amount of hazardous waste you shipped off your property during the reporting period? 16,870,027.0 pounds

4. Where was the hazardous waste sent when it was shipped off of your property? (Attach additional sheet if needed)
See attached sheet

Name	Type of Facility	E.P.A. ID No.	Location (City & State)
1.			
2.			

5. How much hazardous waste did you receive from others at your facility during the reporting period? 3,171,860.0 pounds

6. Who did you receive hazardous waste from when you received it at your facility during the reporting period? (Attach additional sheet if needed)

Name	EPA ID Number	Location (City & State)
1. City of Janesville	WID000712950	Janesville, Wisconsin

EPA ID NUMBER WID059980045

7. What transporters were used during the reporting period when hazardous waste was shipped either to or from your facility? (Attach additional sheet if needed)

Name	EPA ID Number	Location (City & State)
1. See attached sheet		
2.		

8. How much hazardous waste was treated at your facility during the reporting period? N/A .0 pounds

9. List in general terms the kinds of treatment processes used at your facility during the reporting period.

N/A

10. How much hazardous waste did you dispose of at your facility during the reporting period? 3,171,860.0 pounds

11. List in general terms the kinds of disposal techniques (including discharge to municipal treatment works) used at your facility during the reporting period.
Industrial wastewater pretreatment clarifier regulated by electroplating and metal finishing pre-treatment discharge limits.

12. How much hazardous waste did you actually have at your facility site on December 31, 1983? 105,422.0 pounds

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

M. J. Frey
Name (print or type)

M. J. Frey — Plant Engineer — 3-16-84
Signature & Title — Date Signed

Attachment
BZ:hf/3361P-4

Item 4.

	Name	Type of Facility	E.P.A. ID No.	Location (City & State)
1.	City of Janesville - Filtration Bed		WID000712950	Janesville, WI
2.	Waste Research -Recycling		WID990829475	Eau Claire, WI
3.	Hydrite Chemical - Recycling		WID000808824	Cottage Grove, WI
4.	ESL-Treat, Store & Disposal		ILD074411745	Elwood, IL
5.	CID-Treat, Store & Disposal		ILD010284248	Calument City, IL
6.	ACS - Recycling		IND016360265	Griffith, IN
7.	Romicon-Filter Manufacturer-Lab Test		MAD049716522	Woburn, MA

Item 7.

	Name	E.P.A. ID No.	Location (City & State)
1.	GMAD	WID059980045	Janesville, WI
2.	Waste Research	WID990829475	Eau Claire, WI
3.	Hydrite Chemical	WID006435887	Cottage Grove, WI
4.	Waste Management	WID000967149	Menomonee Falls, WI
5.	BFI	ILD005545074	Waukegan, IL
6.	Mr. Frank	ILD069406160	S. Holland, IL
7.	St. Joseph Motor Lines	GAD042097261	Atlanta, GA

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 2

(2) ☒ GENERATOR EPA ID NUMBER NYD 010 20 1 2 6 5 6 5 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME GM ASSEMBLY DIVISION, GMC

STREET 199 BEEKMAN AVENUE

CITY NORTH TARRYTOWN | STATE NEW YORK | ZIP CODE 10591

(3) ☐ TRANSPORTER EPA ID NUMBER | NYSDEC Part 364 Permit No. | –

NAME

STREET

CITY | STATE | ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER CT D 0 0 7 1 2 1 3 8 9 6 9 | NYSDEC Facility I.D. No.

NAME ENVIRONMENTAL WASTE REMOVAL, INC.

STREET 130 FREIGHT STREET

CITY WATERBURY | STATE CONNECTICUT | ZIP CODE 06702

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
WASTE COMPOUND...OR THINNING LIQUID	D 0 0 1 1	0 1 1	T 5 1 0	1 4 8 5 1 0	0 1	0 1 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME | TITLE

SIGNATURE | DATE

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 2

(2) ☒ GENERATOR EPA ID NUMBER NYD 0 9 8 6 5 8 3 7 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME GM ASSEMBLY DIVISION, GMC

STREET 199 BEEKMAN AVENUE

CITY NORTH TARRYTOWN STATE NEW YORK ZIP CODE 10591

(3) ☐ TRANSPORTER EPA ID NUMBER [illegible] NYSDEC Part 364 Permit No. [illegible]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER NJD 0 9 8 6 5 8 3 7 NYSDEC Facility I.D. No.

NAME S & W WASTE, INC.

STREET 53 PENNSYLVANIA AVENUE

CITY SOUTH KEARNY STATE NEW JERSEY ZIP CODE 07032

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
HAZARDOUS WASTE SOLID N.O.S. (1)	X 1 1 0	0 2	T 4 7	8 1 3 5	0 1	0 2
WASTE COMPOUND, ORTHINNING LIQUID (5)	D 0 0 1	0 1	T 3 8	4 0 4 6 8	0 1	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME R. F. WINDAS, JR., P.E. TITLE PLANT ENGINEER

SIGNATURE R. F. Windas, Jr. DATE 3-14-84

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

TAC

MI ID 00 5 35 6 87 8 [redacted]
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GMC-SAGINAW STEERING GEAR-HOLLAND COMP.
30 69

IV. INSTALLATION MAILING ADDRESS

[redacted] 3900 HOLLAND AVENUE
15 16 45
Street or P.O. Box

[redacted] SAGINAW MI 48605
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 45
Street or Route number

15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

[redacted] JAMES LUJORGE INSIEN
15 16 45
Name (last and first)

517-767-4257
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

W. Blair Thompson-General Manager W. B. Thompson 6/23/84
Print/Type Name Title Signature of Authorized Representative Date Signed

[redacted]

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

VIII. GENERATOR'S EPA I.D. NO.

T/A C

[redacted] M I I D 0 0 5 3 6 6 8 7 8 [redacted]

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Fisher Body Division - GMC

X. FACILITY'S EPA I.D. NO.

[redacted] M I I D 0 0 5 3 6 6 7 8

16 28

XI. FACILITY ADDRESS

4300 S. Saginaw St. Plt. #1
Flint, Michigan 48557

XII. TRANSPORTATION SERVICES USED

Chemical Waste Management - OHD018034595

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste spent Sulfuric Acid from steel pickling operations	02 (33 34)	K 0 6 2 (35 38 39 42 43 46 47 50)	6 0 3 2 0 0 (51 59)	P (60)
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number --see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted]M I D0 0 5 3 5 6 8 7 8 [redacted]

1 2 13 14 15 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chemical Waste Management Inc.

X. FACILITY'S EPA I.D. NO.

[redacted]O HD 0 2 0 2 7 3 8 1 9

16 28

XI. FACILITY ADDRESS

3965 State Route
Vickery, Ohio 43464

XII. TRANSPORTATION SERVICES USED

Chemical Waste Management - OHD018034595

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste spent Sulfuric Acid from steel pickling operations	02 (31 34)	K 0 6 2 (35 38 / 39 42)	1 4 2 8 5 4 0 0 (47 50 / 51 59)	P (60)
2			(43 46)		
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] MI | D | 0 0 | 5 | 3 5 | 6 | 8 7 | 8 | T/A C [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Nelson Industrial Services

X. FACILITY'S EPA I.D. NO.

[redacted] MI | D | 0 9 | 8 | 0 1 | 1 | 9 9 | 2 |

XI. FACILITY ADDRESS

12345 Schaefer Highway
Detroit, Mi. 48227

XII. TRANSPORTATION SERVICES USED

K & D Industrial Services - MID072790710
Nelson Industrial Services -MID098011992

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Electroplating Bath Solutions	1 5	F0 0 7	5 2 2 9 5	P
2	Waste laboratory grade picric acid	0 7	D0 0 1	2	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] MI | D | 0 0 | 5 | 3 5 | 6 | 8 7 | 8 [redacted] T/A C

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Petro-Chem Inc.

X. FACILITY'S EPA I.D. NO.

[redacted] MI | D | 9 8 | 0 | 6 1 | 5 | 2 1 9 | 8 |

16 28

XI. FACILITY ADDRESS

421 Lycaste St.
Detroit, Michigan

XII. TRANSPORTATION SERVICES USED

K & D Industrial Service - MID072790710

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste paint solvent (xylene)	0 7	F 0 0 3	2 2 5 0 0	P
		33 34	35 38 39 42 43 46 47 50	51 59	60
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

tear out here

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I D 0 0 5 1 3 5 6 1 8 1 7 8 [redacted] T/A C

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 5 7 0 0 2 6 0 2

16 28

XI. FACILITY ADDRESS

27140 Princeton Ave.
Inkster, MI 48141

XII. TRANSPORTATION SERVICES USED

Drury Brothers - MID056988892
Environmental Waste Control - MID057002602
Pruitt Trucking - MID038608865

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. (DOT Hazard Code)	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste water treatment sludge from various process operations including	1, 2	F 0 0 6 (35–42)	8 0 9 2 0 0 0 (43–51)	P (59–60)
2	Electroplating				
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C
[redacted] MI TD 01 05 31 96 18 78 [redacted]
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem - Met Services

X. FACILITY'S EPA I.D. NO.

[redacted] MI TD 09 16 91 83 11 94
16 28

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, Michigan 48192

XII. TRANSPORTATION SERVICES USED

K & D Industrial Services - MID072790710

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste paint solvent (xylene)	07	F 00 3	0 0 0 0	P
2	Waste water treatment sludge from various process operations including electroplating	12	F 00 6	2 9 7 0 0	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

42-590 O—85——55

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I D 0 0 5 3 5 6 8 7 8 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

McKesson Chemical

X. FACILITY'S EPA I.D. NO.

[redacted] K Y D 0 5 3 3 4 8 1 0 8

XI. FACILITY ADDRESS

State Route 146 P.O. 406
New Castle, Kentucky

XII. TRANSPORTATION SERVICES USED

McKesson Chemical Company - MID010861524
S & C Transport - MID099658288
Schneider Tank Lines - WID023463128

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste trichlordethylene and 1,1,1, trichloroethane solvent and recovery	12	F 0 0 1	2 8 9 2 0 4	P
2	Sludges				
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

Tear out here

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

T A C

[redacted] M I D 0 0 3 9 3 7 0 2 6 [redacted]
1 2 13 14 15

III. NAME OF INSTALLATION

G M C - S A G I N A W S T E E L I N G B A R - P L A N T # 1
30 69

IV. INSTALLATION MAILING ADDRESS

[redacted] 3 9 0 0 H O L L A N D A V E N U E
15 16 45
Street or P.O. Box

[redacted] S A G I N A W M I 4 8 6 0 5
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

[redacted] 6 2 8 N O R T H H A M L I N S T R E E T
15 16 45
Street or Route number

[redacted] S A G I N A W M I 4 8 6 0 2
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

[redacted] T A M E S L I O R I E N S E N
15 16 45
Name (last and first)

5 0 7 - 7 7 6 - 4 2 5 7
46 55
Phone No. (area code & no.)

[redacted]

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

W. Blair Thompson - General Manager W.B. Thompson 6/21/84

Print/Type Name Title Signature of Authorized Representative Date Signed

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C

[redacted] MD | D | 00 | 3 | 90 | 3 | 7 | 02 | 6 [redacted]

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

McKesson Chemical

X. FACILITY'S EPA I.D. NO.

[redacted] KY | D | 05 | 38 | 4 | 88 | 10 | 8 |

YR 28

XI. FACILITY ADDRESS

State Route 146 P.O Box 406
New Castle, Kentucky

XII. TRANSPORTATION SERVICES USED

S&C Transport - MID099658288
McKesson Chemical Company- KYD053348108
Schneider Tank Lines- WID023463128

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Trichloroethylene Solvent and Recovery Sludges	1 2 (33 34)	H0 | 0 | 1 (35 38 39 42)	5 | 2 | 5 0 | 0 (43 46 47 50 51 59)	P (60)
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

MI D 00 3 93 7 02 6 [redacted]

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Nelson Industrial Services

X. FACILITY'S EPA I.D. NO.

MI D 09 8 01 1 99 2

XI. FACILITY ADDRESS

12345 Schaeffer Highway
Detroit, Michigan 48227

XII. TRANSPORTATION SERVICES USED

K & D Industrial Service - MID072790710

XIII. WASTE IDENTIFICATION

Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Electroplating Bath Solutions	15	F 007	15 77 11	P
2	Waste Quench Oil/Sludge	12	F010	97 50	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

II. GENERATOR'S EPA I.D. NUMBER

TAC

MID 991 076 012 82 [redacted]
1 2 13 14 15

III. NAME OF INSTALLATION

GM CL-SAGINAW STEERING GEAR PLANT #2
30 69

IV. INSTALLATION MAILING ADDRESS

3900 HOLLAND AVENUE
15 16 45
Street or P.O. Box

SAGINAW MI 48605
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

1400 HOLMES STREET
15 16 45
Street or Route number

SAGINAW MI 48602
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

JAMES LLOYD GEORGE
15 16 45
Name (last and first)

917-776-1257
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

W. Blair Thompson-General Manager W. B. Thompson 6/25/84
Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

T/A C

[redacted] M I 1 0 9 9 1 0 7 1 6 0 1 2 1 8 2 [redacted]

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

McKesson Chemical

X. FACILITY'S EPA I.D. NO.

[redacted] K Y D 0 5 3 1 3 4 8 1 1 0 8

16 28

XI. FACILITY ADDRESS

State Route 146 P.O Box 406
New Castle, Kentucky

XII. TRANSPORTATION SERVICES USED

McKesson Chemical Company - MID010861524

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Trichloroethylene and 111 Trichloroethane Solvent and Recovery	1 2 (03 14)	F 0 0 1 (15 18 / 39 42)	4 1 1 9 0 (31 39)	P (60)
2	Sludges				
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

[redacted] M I D 9 9 0 7 6 0 2 8 2 [redacted]
1 2 13 14 15 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

[redacted] M I D 0 5 7 0 0 2 6 0 2
16 28

XI. FACILITY ADDRESS

27140 Princeton Ave.
Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Yoder Trucking Inc. - MIT270013683
Drury Brothers - MID056988892
Ray Molder Inc. - MID052042959

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Water Treatment Sludge from various process Operations	12	F 0 0 6	6 1 3 6 5 5 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-Handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print or type with elite type (12 characters per inch).

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

1 M I D 9 8 0 7 0 0 8 2 7 (1-12)

III. NAME OF INSTALLATION

OLDSMOBILE DIVISION GENERAL MOTORS CORP.

IV. INSTALLATION MAILING ADDRESS

3 920 TOWNSEND STREET PLANT 2&3

Street or P.O. Box

4 LANSING MI 48921

City or Town — State — Zip Code

Tear out here

V. LOCATION OF INSTALLATION (if different than section IV above)

5 2800-2801 W. SAGINAW STREET

Street or Route number

6 LANSING MI 48921

City or Town — State — Zip Code

VI. INSTALLATION CONTACT

7 KENNETH GRIMES

Name (last and first)

517 377 5160

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

KENNETH W. GRIMES, HAZ. MATL. COOR. _____ 3-14-84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 7 0 0 8 2 7

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A-1 DISPOSAL, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 BROAD STREET, P.O. BOX 248
PLAINWELL, MI, 49080

XII. TRANSPORTATION SERVICES USED

MID059699452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
1	1	IGNITABLE, E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUC-	0 8	D 0 0 1	D 0 0 8	6 8 7 6	P
	2	TION; MIXTURE OF TOLUENE, ETHYL		F 0 0 5	F 0 0 4		
	3	IGNITABLE, E.P. TOXIC, LISTED	0 8	D 0 0 1	D 0 0 7	2 0 3 5	P
	4	LIQUID FROM AUTOMOBILE PRODUC-		D 0 0 8	F 0 0 3		
	5	TION; MIXTURE OF PAINT PIGMENTS,		F 0 0 5			
	6	RESINS, TOLUENE, ACETONE, ISO-					
	7	PROPYL ALCOHOL, CYCLOHEXANONE,					
	8	ETHYL BENZENE, OCTANE AND XYLENE.					
2	1	IGNITABLE, E.P. TOXIC, LISTED	0 8	D 0 0 1	D 0 0 7	2 0 3 5	P
	2	LIQUID FROM AUTOMOBILE PRODUC-		D 0 0 8	F 0 0 3		
	3	TION; MIXTURE OF TOLUENE, ETHYL		F 0 0 5			
	4	BENZENE, XYLENE AND RESINS.					
3	1	CORROSIVE, E.P. TOXIC LIQUID	0 2	D 0 0 2	D 0 0 7	2 0 2 4	P
	2	FROM AUTOMOBILE PRODUCTION;		D 0 0 8			
	3	MIXTURE OF DESCALING COMPOUNDS,					
	4	CHROMIC ACID AND SODIUM CHROMATE.					
4	1	LISTED, E.P. TOXIC LIQUID FROM	1 5	F 0 0 2	D 0 0 8	2 0 2 3	P
	2	AUTOMOBILE PRODUCTION; MIXTURE					
	3	OF TRICHLOROMONOFLUOROMETHANE					
	4	AND SUSPENDED SOLIDS.					
5	1	IGNITABLE LIQUID FROM AUTOMOBILE	0 8	D 0 0 1	F 0 0 3	4 2 9	P
	2	PRODUCTION; MIXTURE OF SURFAC-					
	3	TANTS, ISO-PROPYL ALCOHOL,					
	4	ETHYL BENZENE, XYLENE AND AN					
	5	AQUEOUS SOLUTION.					

XIV. COMMENTS (enter information by section number—see instructions)

THINNER (COMPOSITE S), PAINT (LAB # 1789-82), ENERSCO DESCALER (LAB # 2403-83 #2), FREON II (SAMPLE 35C), MICROBIOCIDE (SAMPLE 2E)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

MIDO98017018271 (DATE)

X. FACILITY'S EPA I.D. NO.

MID059695452

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A-1 DISPOSAL, INC.

XI. FACILITY ADDRESS

400 BROAD STREET, P.O. BOX 248
PLAINWELL, MI, 49080

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	IGNITABLE, LISTED, E.P. TOXIC INK FROM AUTOMOBILE PRODUCTION;	0 8	D 0 0 1	D 0 0 7 F 0 0 4	4 3 5	P
	2	MIXTURE OF ETHANOL, ISO-PROPANOL, ETHYL ACETATE, ETHYL CELLOSOLVE,		F 0 0 5			
	3	ISO-PROPYL ACETATE, TOLUENE AND PIGMENTS.					
	4	IGNITABLE, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	0 8	D 0 0 1	F 0 0 1	3 8 5	P
	5	OF FUEL OIL AND 1,1,1 TRICHLORO-ETHANE.					
	6						
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE #S 11E (INK), AND 24E.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calender year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

MIT

MID 980 708 240

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

MID 096 963 194

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI, 48192

XII. TRANSPORTATION SERVICES USED

MID072790710, MID000820369 AND MID059095452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	CORROSIVE SULFURIC ACID FROM AUTOMOBILE PLATING OPERATIONS;	0 2	D 0 0 2		6 0 0 0	P
	2	MIXTURE OF SULFURIC ACID AND SUSPENDED SOLIDS.					
	3	CORROSIVE LIQUID FROM AUTOMOBILE PLATING OPERATIONS; MIXTURE OF	0 2	D 0 0 2	D 0 0 7	5 6 0 0 0	P
	4	NICKEL, CHROME AND COPPER PLATING SOLUTIONS, E.P. TOXIC.					
	5	E.P. TOXIC OILY SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 6 D 0 0 8	D 0 0 7	1 1 4 0 0	P
	6	OF OILS, SUSPENDED SOLIDS AND WATER.					
	7	E.P. TOXIC LAPPING COMPOUND FROM AUTOMOBILE PRODUCTION;	1 5	D 0 0 7		7 6 1 5 6	P
	8	MIXTURE OF GRAPHITE AND OIL.					
	9	CORROSIVE NICKEL BRIGHTENER FROM AUTOMOBILE PLATING OPERA-	0 2	D 0 0 2		2 6 4 0	P
	10	TIONS; AN AQUEOUS SOLUTION.					
	11	E.P. TOXIC WETTING AGENT, LIQUID FROM AUTOMOBILE PLATING OPERA-	1 5	D 0 0 7		1 0 1 2 0	P
	12	TIONS, AN AQUEOUS SOLUTION.					

XIV. COMMENTS (enter information by section number—see instructions)

SULFURIC ACID, PLATING RENOVATION SOLUTION, OILY SLUDGE (LAB # 1835-82), LAPPING COMPOUND (LAB # 1486-82 # 6), 2NS BRIGHTENER, UDYLITE # 62 WETTING AGENT (LAB # 2338-83 #2)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 7 0 0 8 2 7 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MICHIGAN, 48192

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. 1001 Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
29	1	E.P. TOXIC SOLID FROM AUTOMOBILE PRODUCTION; MIXTURE OF	1 5	D 0 0 8		5 1 4 8	P
	2	ASHED POLYMER RESIDUES.					
	3	CORROSIVE NICKEL BRIGHTENER LIQUID FROM AUTOMOBILE PLATING	0 2	D 0 0 2		7 0 4 0	P
	4	OPERATIONS; AN AQUEOUS SOLUTION.					
	5	E.P. TOXIC NICKEL BRIGHTENER LIQUID FROM AUTOMOBILE PLATING	1 5	D 0 0 7		8 8 0 0	P
	6	OPERATIONS; MIXTURE OF AQUEOUS SOLUTIONS.					
	7	E.P. TOXIC GREASE FROM AUTOMOBILE PRODUCTION.	1 5	D 0 0 4 D 0 0 8	D 0 0 7 D 0 0 9	4 0 7	P
	8	CORROSIVE SOAP, A CAUSTIC SOLID FROM AUTOMOBILE PRODUCTION.	0 2	D 0 0 2		9 6 8	P
	9	E.P. TOXIC SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF	1 5	D 0 0 7		6 6 6 6	P
	10	OILS, INORGANIC SALTS, AND AN AQUEOUS SOLUTION.					
	11	CORROSIVE SLUDGE FROM AUTOMOBILE PRODUCTION, MIXTURE OF GRINDING	0 2	D 0 0 2		7 6 5	P
	12	COMPOUND AND AN AQUEOUS SOLUTION.					

XIV. COMMENTS (enter information by section number—see instructions)

UNICHROME BURNOFF (LAB # 2044-83 #12), E-BRIGHTENER, UDYLITE NICKEL BRIGHTENER #63 (LAB # 2338-83 #1), GREASE (COMPOSITE F), BONDERLUBE SOAP (LAB # 2216-83 #7), LUBRITE SLUDGE (LAB # 2074-83 # 1), SAMPLE # 23E.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 7 0 0 8 2 7 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI, 48192

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 9 6 3 1 9 4

XII. TRANSPORTATION SERVICES USED

MIDO59695452

XIII. WASTE IDENTIFICATION

Sequence #	New	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1		CORROSIVE LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF	0, 2	D 0 0 2	4, 5, 7	P
2		CAUSTIC SOLUTIONS.				
3		E.P. TOXIC OILS FROM AUTOMOBILE PRODUCTION; MIXTURE OF OILS,	1, 5	D 0 0 7	3, 7, 4	P
4		SUSPENDED SOLIDS AND WATER.				
5		E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF	1, 5	D 0 0 7	8, 5, 8	P
6		OILS, GREASE AND AN AQUEOUS SOLUTION.				
7		CORROSIVE, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION.	0, 2	D 0 0 2 / D 0 0 8	5, 9, 4	P
8		A CAUSTIC SOLUTION.				
9		E.P. TOXIC AQUEOUS SOLUTION FROM AUTOMOBILE PRODUCTION.	1, 5	D 0 0 7	4, 5, 1	P
10		CORROSIVE CAUSTIC SOLID FROM AUTOMOBILE PRODUCTION.	0, 2	D 0 0 2	5, 4, 4	P
11						
12						

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE #S 23E, 74E, 84E, 85E, 135E, 136E, 137E.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 7 0 0 8 2 7 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEMICAL RECOVERY SYSTEMS, INC.

XI. FACILITY ADDRESS

36345 VAN BORN ROAD
ROMULUS, MICHIGAN, 48174

X. FACILITY'S EPA I.D. NO.

F M I D 0 6 0 9 7 5 8 4 4

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	LISTED, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	F 0 0 1 / F 0 0 2 / F 0 0 3 / D 0 0 4	8 4 3 1 2	P
2	OF 1,1,1 TRICHLORCETHANE, OIL, METHYLENE CHLORIDE, METHYL				
3	ACETATE, 1,2 DICHLOROETHANE AND TOLUENE.				
4	LISTED, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	F 0 0 1 / D 0 0 6 / D 0 0 8	5 0 1	P
5	OF 1,1,1 TRICHLOROETHANE, OILS, AND AN AQUEOUS SOLUTION.				
6	IGNITABLE, LISTED, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUC-	0 8	D 0 0 1 / D 0 0 6 / D 0 0 8 / F 0 0 1	1 0 7 8	P
7	TION; MIXTURE OF 1,1,1 TRI- CHLOROETHANE, OILS AND GREASE				
8	IGNITABLE, LISTED, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUC-	0 8	D 0 0 1 / D 0 0 6 / D 0 0 7 / D 0 0 8	4 2 9	P
9	TION; MIXTURE OF 1,1,1 TRI- CHLOROETHANE, OILS, GREASES,		F 0 0 1		
10	NAPTHA AND 1,2 DICHLOROETHANE.				
11	IGNITABLE, LISTED, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUC-	0 8	D 0 0 1 / D 0 0 6 / D 0 0 7 / D 0 0 8	4 8 4	P
12	TION; MIXTURE OF OILS, GREASES, 1,1,1 TRICHLOROETHANE AND NAPTHA.		F 0 0 1		

XIV. COMMENTS (enter information by section number—see instructions)

1,1,1 TRICHLOROETHANE (LAB # 1783-82 #6), SAMPLE #S 25E, 75E, 80E, 81E.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 7 0 0 8 2 7 (1)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEMICAL RECOVERY SYSTEMS, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 0 6 0 9 7 5 8 4 4

XI. FACILITY ADDRESS

36345 VAN BORN ROAD
ROMULUS, MI, 48174

XII. TRANSPORTATION SERVICES USED

MID059095452

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	IGNITABLE, LISTED, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUC-	0 8	D 0 0 1 / D 0 0 7 / F 0 0 4 / F 0 0 5	5 3 4	P
	2	TION; MIXTURE OF 1,1,1 TRI- CHLOROETHANE, OILS, GREASES,		F 0 0 2 / F 0 0 3 / F 0 0 5		
	3	1,2 DICHLOROETHANE, TOLUENE, METHYLENE CHLORIDE, METHYL ETHYL				
	4	KETONE AND 1,1 DICHLOROETHANE.				
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE # 82E

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

(G M I D 9 8 0 7 0 0 8 2 7 I A C 1)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENVIRONMENTAL WASTE CONTROL, INC.

X. FACILITY'S EPA I.D. NO.

(F M I D 0 5 7 0 0 2 6 0 2)

XI. FACILITY ADDRESS

27140 PRINCETON
INKSTER, MICHIGAN, 48141

XII. TRANSPORTATION SERVICES USED

MID056988892, MID052042959, MIT270013683 AND MID057002602

XIII. WASTE IDENTIFICATION

Sequence #	H Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	E.P. TOXIC OILS FROM AUTOMOBILE PRODUCTION; MIXTURE OF OILS,	1 5	D 0 0 7	1 2 4 0 0 0	P
	2	SUSPENDED SOLIDS AND WATER.				
	3	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 7 D 0 0 8	2 6 4 6 0 0 0	P
	4	OF OILS, SUSPENDED SOLIDS, WATER AND 1,1,1 TRICHLOROETHANE.		F 0 0 1		
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

PLANT 2 OIL (HYDRA LAB # 53869), PLANT 3 (301A) OIL (LAB # 2235-83 # 3)

42-590 O—85——56

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 7 0 0 8 2 7

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

GENERAL OIL COMPANY

X. FACILITY'S EPA I.D. NO.

F M I D 0 4 7 1 8 9 5 6 8

XI. FACILITY ADDRESS

12680 BEECH DALY ROAD
REDFORD, MI, 48239

XII. TRANSPORTATION SERVICES USED

MID980791529 AND MID099658288

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. EP Toxic / Hazardous Waste	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	E.P. TOXIC OILS FROM AUTOMOBILE PRODUCTION; MIXTURE OF OILS,	1 5	D 0 0 7	1 9 2 0 0 0	P
2	SUSPENDED SOLIDS AND WATER.				
3	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 7 D 0 0 8	3 3 3 3 1 2 0	P
4	OF OILS, SUSPENDED SOLIDS, WATER AND 1,1,1 TRICHLOROETHANE		F 0 0 1		
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

PLANT 2 OIL (HYDRA LAB # 53869), PLANT 3 OIL (301A) (LAB # 2235-83 #3)

THESE ITEMS ARE SOLD AND RECLAIMED FOR BENEFICIAL USE.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 9 8 0 7 0 0 8 2 7 1 (EAT)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL, INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 0 0 7 2 4 8 3 1

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE
BELLEVILLE, MI, 48111

XII. TRANSPORTATION SERVICES USED

MID086148202

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	E.P. TOXIC SLUDGE FROM AUTOMOBILE PRODUCTION; LAPPING COMPOUND, A MIXTURE OF GRAPHITE AND OILS.	1 5	D 0 0 7	1 8 2 5 2 7	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

LAPPING COMPOUND (LAB # 1486-82 # 6)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 7 0 0 8 2 7 (1-2, 13-15)

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 8 0 1 1 9 9 2 (10-21)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

NELSON INDUSTRIAL SERVICES, INC.

XI. FACILITY ADDRESS

12345 SCHAEFFER HIGHWAY
DETROIT, MI, 48227

XII. TRANSPORTATION SERVICES USED

MID000820365 AND MID098011992

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code (22-23)	C. EPA Hazardous Waste No. (see instructions) (24-41)	(42-59)	D. Amount of Waste (60-68)	E. Unit of Measure (69)
	1	CORROSIVE, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION;	0 2	D 0 0 2	D 0 0 7	2 6 9 9 8 4	P
	2	MIXTURE OF CHROME, COPPER AND NICKEL PLATING SOLUTIONS.					
	3	TOXIC, REACTIVE, LISTED LIQUID FROM AUTOMOBILE PLATING OPERA-	1 8	F 0 0 7	D 0 0 3	1 1 1 6 9 0 0	P
	4	TIONS, CYANIDE PLATING SOLUTION,					
	5	INORGANIC SALTS AND AN ALKALINE					
	6	AQUEOUS SOLUTION.					
	7	TOXIC, REACTIVE, LISTED SOLIDS FROM AUTOMOBILE PLATING OPERA-	1 8	F 0 0 8	D 0 0 3	1 4 3 4 6 7	P
	8	TIONS; MIXTURE OF COPPER CYAN-					
	9	IDE SALTS AND PAPER.					
	10	CORROSIVE SOLIDS FROM AUTOMO-		D 0 0 2			
	11	BILE PLATING OPERATIONS; MIX-	0 2			2 6 6 3 3	P
	12	TURE OF ACIDIC PAPER AND RESIDUES.					
	13	CORROSIVE SOLIDS FROM AUTOMO-		D 0 0 2			
	14	BILE PLATING OPERATIONS; MIX-	0 2			1 4 4 2 6	P
	15	TURE OF ACIDIC PAPER AND RESIDUES.					
	16						

XIV. COMMENTS (enter information by section number—see instructions)

PLATING RENOVATION SOLUTION, CYANIDE PIT SOLUTION (LAB # 1499-82 #1)
CYANIDE FILTER PAPERS (LAB # 1486-82 #8), ACID COPPER FILTER PAPERS
(LAB # 1486-82 #9) AND ACID COPPER ANODE BAGS (LAB # 1486-82 # 9)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 7 0 0 8 2 7 (1)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

NELSON INDUSTRIAL SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 8 0 1 1 9 9 2

XI. FACILITY ADDRESS

12345 SCHAEFFER HIGHWAY
DETROIT, MI, 48227

XII. TRANSPORTATION SERVICES USED

MID098011992

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. TSDF Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	CORROSIVE SOLID FROM AUTOMOBILE PRODUCTION; MIXTURE OF ACIDIC	0 2	D 0 0 2	1 8 8 6 5	P
	2	CLOTH AND RESIDUES.				
	3	TOXIC, CORROSIVE LIQUID FROM AUTOMOBILE PLATING OPERATIONS;	0 2	D 0 0 2	2 0 0 5 8 3 0	P
	4	MIXTURE OF COPPER SALTS AND AN AQUEOUS COPPER PLATING SOLUTION.				
	5	CORROSIVE, E.P. TOXIC LIQUID FROM AUTOMOBILE PLATING OPERA-	0 2	D 0 0 2 D 0 0 7	8 4 2 8 0 0	P
	6	TIONS; MIXTURE OF CHROMIC ACID AND AN AQUEOUS SOLUTION.				
	7	E.P. TOXIC SLUDGE FROM AUTOMO-	1 5	D 0 0 7	2 3 4 9 0	P
	8	BILE PRODUCTION; MIXTURE OF CHROMIC ACID SLUDGES.				
	9	LISTED PROCESS SOLID FROM AUTO-	1 5	F 0 0 6	1 7 6 4 0 0	P
	10	MOBILE PLATING OPERATIONS; MIXTURE OF NICKEL, COPPER AND CHROME METAL HYDROXIDES.				
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ACID COPPER FILTER PAPER CLOTH (LAB # 1486-82 # 9), ACID COPPER PIT SOLUTION (LAB # 1486-82 # 12), CHROMIC ACID SOLUTION (LAB # 1499-82 # 2), HEAVY METAL TREATMENT SLUDGE (LAB # 1571-82 #4)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

(C, M, I, D, 9, 8, 0, 7, 0, 0, 8, 2, 7, 1, 1)

X. FACILITY'S EPA I.D. NO.

(F, M, I, D, 9, 8, 0, 7, 0, 0, 8, 4, 3)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

OLDSMOBILE DIV. GMC.

XI. FACILITY ADDRESS

2901 S. CANAL ROAD - PLANT 5
LANSING, MI, 48921

XII. TRANSPORTATION SERVICES USED

MID980791529

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. Hazardous Waste?	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 7 D 0 0 8 F 0 0 5	2,0,7,4,8,0,0	P
	2	OF OILS, SUSPENDED SOLIDS, 1,1,1 TRICHLOROETHANE AND WATER.				
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

PLANT 3 (301A) OIL (LAB E 2235-83 # 3)

THIS IS SENT FOR RECLAIM PURPOSES.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd _____ Rec'd by _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 0 8 7 0 0 8 2 7 | 1
1 2 13 14 15

X. FACILITY'S EPA I.D. NO.

F I N D 0 0 0 6 4 6 9 5 0
16 25

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

TITAN OIL COMPANY

XI. FACILITY ADDRESS

1509 S. SENATE
INDIANAPOLIS, IN, 46225

XII. TRANSPORTATION SERVICES USED

MID056988892 AND MIT270013683

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. TSDF Hazard. Waste	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
28 32	1	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1.5	D 0 0 7 D 0 0 8 (35 38 39 42)	7 1 4 0 0 0 (51 56)	P (60)
	2	OF OILS, SUSPENDED SOLIDS, WATER, AND 1,1,1 TRICHLOROETHANE.		F 0 0 2 (41 47 50)		
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

PLANT 3 OIL (301A) (LAB #2235-83 #3)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 7 0 0 8 2 7 1

X. FACILITY'S EPA I.D. NO.

F M I D 0 4 8 0 9 0 6 3 3

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped):

WAYNE DISPOSAL, SITE # 2

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE
BELLEVILLE, MI, 48111

XII. TRANSPORTATION SERVICES USED

MID000820365 AND MID086148202

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	LISTED PROCESS WASTE FROM AUTOMOBILE PLATING OPERATIONS,	1 5	F 0 0 6	1 0 6 9 1 1 0	P
	2	MIXTURE OF COPPER, CHROME, AND NICKEL METAL HYDROXIDES.				
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

HEAVY METAL TREATMENT SLUDGE (LAB # 1571-82 #4)

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

TAC

(1,2) MID005356894 (11,14,15) 1

III. NAME OF INSTALLATION

(30) OLDS MOBILE DIVISION GENERAL MOTORS CORP. (69)

IV. INSTALLATION MAILING ADDRESS

(15,16) 3920 TOWNSEND STREET PLANT 1 (45)
Street or P.O. Box

(15,16) LANSING (41,42) MI (47) 8921 (51)
City or Town — State — Zip Code

Tear out here

V. LOCATION OF INSTALLATION (if different than section IV above)

(15,16) (45)
Street or Route number

(15,16) (41,42) (47) (51)
City or Town — State — Zip Code

VI. INSTALLATION CONTACT

(15,16) KENNETH GRIMES (47)
Name (last and first)

(46) 517-377-5160 (55)
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Kenneth W. Grimes, Hazardous Materials Coordinator — Kenneth W. Grimes — 3-18-84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13A (5-80) (Revised 11-83)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 6 1 5 6 8 9 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A - 1 Disposal, Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 Broad Street, P.O. Box 248
Plainwell, MI 49080

XII. TRANSPORTATION SERVICES USED

MID 059695452
MID 092947928

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. EPA Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Ignitable solvent used in automobile production; mixture of naphas.	0 8	D 0 0 1	3 2	P
2					
3	Ignitable solvent. Used in automobile production; mixture of sulfur and carbon disulfide	0 8	D 0 0 1 F 0 0 5	4 8	P
4					
5	Ignitable solvents used in automobile production; mixture of ethyl acetate, n-propyl acetate paint pigments, isopropanol,	0 8	D 0 0 1 F 0 0 3	3 2	P
6					
7	ethanol, n-propanol.				
8	Ignitable die etchant used in automobile production; mixture of turpentine and pigments.	0 8	D 0 0 1	8	P
9					
10	Ignitable, E.P. toxic, listed solvents used in automobile	0 8	D 0 0 1 D 0 0 8 F 0 0 3 F 0 0 5	1 4 4 2 0 1	P
11	production; mixture of toluene, ethyl benzene, xylene and res.				
12					

XIV. COMMENTS (enter information by section number—see instructions)

Stress Coat Naptha, Stress Coat Carbon Disulfide, Stress Coat Ethyl Acetate, Stress Coat Dieetchant, Thinner

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A - 1 Disposal, Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 Broad Street, P.O. Box 248
Plainwell, MI 49080

XII. TRANSPORTATION SERVICES USED

MID 059695452

XIII. WASTE IDENTIFICATION

Sequence #		A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	Ignitable, E.P. Toxic Paints used in automobile production;	0 8	D 0 0 1	D 0 0 7	3 7 8 5 8	P
	2	mixture of Paint Pigments, Resins, Toluene, Acetone, Iso-		F 0 0 5			
	3	Propyl Alcohol, Cyclohexanone, Ethyl Benzene, Octane and					
	4	Xylene.					
	5	Reactive, Toxic spent Cyanide. Used in automobile production;	1 8	D 0 0 3		2 7 0 0	P
	6	mixture of white powdery solids.					
	7	Reactive, E.P. Toxic solid from automobile production; mixture	1 5	D 0 0 3	D 0 0 5	7 0 1 8	P
	8	of caustic solids with traces of cyanide.					
	9	Reactive, E.P. Toxic solid from automobile production;	1 5	D 0 0 3	D 0 0 5	2 6 1 8	P
	10	mixture of caustic solids with traces of cyanide.					
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

Paint, Sample #s 53 C, 81 C, 82 C

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A - 1 Disposal, Inc.

X. FACILITY'S EPA I.D. NO.

M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 Broad Street, P.O. Box 248
Plainwell, MI 49080

XII. TRANSPORTATION SERVICES USED

MID 059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	Ignitable, E.P. Toxic, listed liquid from automobile produc-	0 8	D 0 0 1 D 0 0 7 D 0 0 8 F 0 0 1	4 9 5	P
	2	tion; mixture of oils, resins, 1,1,1 trichloroethane, xylene		F 0 0 3 F 0 0 5		
	3	iso-propyl alcohol, toluene, cellosolve acetate and ethyl				
	4	benzene.				
	5	Ignitable, E.P. Toxic, listed liquid from automobile produc-	0 8	D 0 0 1 D 0 0 7 D 0 0 8 F 0 0 3	4 4 6	P
	6	tion; mixture of paint pigments acetone, toluene, iso-propyl		F 0 0 5		
	7	alcohol, ethyl acetate, ethyl benzene and xylene.				
	8	Ignitable, E.P. Toxic, listed liquid from automobile produc-	0 8	D 0 0 1 D 0 0 7 D 0 0 8 F 0 0 1	4 7 9	P
	9	tion; mixture of 1,1,1 trichloro-		F 0 0 3 F 0 0 5		
	10	ethane, resins, oils, acetone, iso-propyl alcohol, cellosolve				
	11	acetate, toluene, ethyl benzene and xylene.				
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Sample #s 87C, 88C, 89C.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A-1 Disposal, Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 Broad Street, P.O. Box 248
Plainwell, MI 49080

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	Ignitable, E.P. Toxic, listed liquid from automobile production; mixture of paint pigments, acetone, toluene, iso-propyl alcohol, octane and xylene.	0 8	D 0 0 1 D 0 0 7 D 0 0 8 F 0 0 3	4 1 3	P
	2					
	3					
	4	Ignitable, listed liquid from automobile production; mixture of acetone, ethyl acetate, xylene, toluene, oils and an aqueous solution.	0 8	D 0 0 1 F 0 0 3 F 0 0 5	7 0 6	P
	5					
	6					
	7	Ignitable, E.P. Toxic, listed liquid from automobile production; mixture of iso-propyl alcohol, ethanol, ethyl acetate, ethyl cellosolve, iso-propanol, acetate, toluene, and pigments	0 8	D 0 0 1 D 0 0 7 D 0 0 8 F 0 0 3	1 3 0 4	P
	8					
	9					
	10	Ignitable, listed liquid from automobile production; mixture of iso-propyl alcohol, surfactants, an aqueous solution, ethyl benzene and xylene.	0 8	D 0 0 1 F 0 0 3	4 5 2 4	P
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

(G) M I D 0 0 5 3 5 6 8 9 4 (A)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A - 1 Disposal, Inc.

X. FACILITY'S EPA I.D. NO.

(F) M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 Broad Street, P.O. Box 248
Plainwell, MI 49080

XII. TRANSPORTATION SERVICES USED

MID 059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
22	1	Listed, E.P. Toxic liquid from automobile production; mixture	1,5	F,0,0,2 D,0,0,8	6,5,5	P
	2	of trichloromonofluoromethane and suspended solids.				
	3	Ignitable, listed liquid from automobile production; mixture	0 8	D,0,0,1 F,0,0,3	4,4,0	P
	4	of petroleum distillates, isopropanol, oils and methyl iso-				
	5	butyl ketone.				
	6	Ignitable, listed liquid from automobile production; mixture	0,8	D,0,0,1 F,0,0,5	3,8,0	P
	7	of toluene, methyl ethyl ketone and oils.				
	8	Ignitable, E.P. Toxic, listed liquid from automobile produc-	0,8	D,0,0,1 D,0,0,5 D,0,0,7 F,0,0,1	9,9,9,4	P
	9	tion; mixture of petroleum		F,0,0,2		
	10	distillates, methylene chloride and 1,1,1 trichloroethane.				
	11	Ignitable, E.P. Toxic liquid from automobile production;	0,8	D,0,0,1 D,0,0,8 D,0,0,9	1,2,4,5	P
	12	mixture of gasoline and water.				

XIV. COMMENTS (enter information by section number—see instructions)

Sample #s 35C (Freon), 21E, 22E, 26E, Gasoline.

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 (1 A L)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A-1 Disposal, Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 Broad Street, P.O. Box 248
Plainwell, MI 49080

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #		A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	Ignitable, listed liquid from automobile production; mixture	0 8	D 0 0 1	F 0 0 1	3 9 1	P
	2	of petroleum distillates and 1,1,1 Trichloroethane.					
	3	Ignitable, E.P. Toxic liquid from automobile production;	0 8	D 0 0 1	D 0 0 7	1 1 0 6	P
	4	mixture of oils, greases and petroleum distillates.					
	5	Ignitable, E.P. Toxic listed liquid from automobile produc-	0 8	D 0 0 1 F 0 0 1	D 0 0 7	8 8 0	P
	6	tion; mixture of naptha, 1,1,1 trichloroethane and an aqueous					
	7	solution.					
	8	E.P. Toxic liquid from auto-	1 5	D 0 0 7		4 2 4 7 1	P
	9	mobile production; mixture of non-reacted isocyanates.					
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

Sample #s 42E, 86E, 101E, Isocyanate (1499-82 #9).

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

MID 005355694

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A - 1 Disposal, Inc.

XI. FACILITY ADDRESS

400 Broad Street, P.O. Box 248
Plainwell, MI 49080

X. FACILITY'S EPA I.D. NO.

FMID059695452

XII. TRANSPORTATION SERVICES USED

MID 059695452

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (DOT) Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Ignitable, listed liquid from automobile production; mixture	0 8	D001 F005 F002 F004	3,14	P
2	of acetone, methanol, 1,1,1 Trichloroethane, toluene, ad-		F005		
3	hesives and methylene chloride.				
4	Listed liquid from automobile production; mixture of methylene	1 3	F002	1,2272	P
5	chloride, polymer solids and styrene.				
6	E.P. Toxic liquid from automo-	1 5	D007	1,353	P
7	bile production; an aqueous solution.				
8	Ignitable liquid from automo-	0 8	D001	435	P
9	bile production; mixture of oils, gasoline and water.				
10	Ignitable, listed sludge from	0 8	D001 F003	979	P
11	automobile production; mixture of resins, polymers, ethanol,		F005		
12	iso-propanol, methyl iso-butyl ketone, toluene, methanol and n-propyl acetate.				

XIV. COMMENTS (enter information by section number—see instructions)

Sample #s 99E, Methylene chloride, Sample #121E, 127E, 128E.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 5 3 5 6 8 9 4 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A-1 Disposal, Inc.

X. FACILITY'S EPA I.D. NO.

M I D 0 5 9 6 9 5 4 5 2

XI. FACILITY ADDRESS

400 Broad Street, P.O. Box 248
Plainwell, MI 49080

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	Ignitable listed liquid from automobile production, mixture	0 8	D 0 0 1	F 0 0 1 F 0 0 3	4 6 8	P
	2	of oils, resins, toluene, ethyl benzene, xylene, iso-propanol,					
	3	methyl ethyl ketone and trichloro-ethylene.					
	4	Listed liquid from automobile production; mixture of methyene	1 3	F 0 0 2		9 1 8	P
	5	chloride and adhesives.					
	6	Ignitable solid from automobile production; mixture of polymer	0 8	D 0 0 1		3 3 7 3 0 0	P
	7	sealant and naptha.					
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

Sample #s 129E, 130E, Composite C (Mastic).

Tear out here

42-590 O—85——57

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Cascade Resource Company

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 0 7 1 8 7 0 0

XI. FACILITY ADDRESS

6200 52nd S.E.
Grand Rapids, MI 49508

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Listed process solid from automobile production; a zinc	1 5	F 0 0 6	1 2 6 3 6	P
2	phosphating waste, an inorganic waste.				
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Zinc Phosphating Solids

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 (EXT. 1)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Cecos/CER Company

X. FACILITY'S EPA I.D. NO.

F O H D 0 8 7 4 3 3 7 4 4

XI. FACILITY ADDRESS

5092 Aber Road
Williamsburg, Ohio 45176

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Ignitable solid from automobile production; mixture of polymer	0 9	D 0 0 1	9 3 6 2	P
	2	sealants and naptha.				
	3	Ignitable solid from automobile production; mixture of	0 9	D 0 0 1	1 3 8 6	P
	4	gasoline and sodium carbonate.				
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Composite C (Mastic), Sample 36E

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 5 3 5 6 8 9 4 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met Services, Inc.

X. FACILITY'S EPA I.D. NO

F M I D 0 1 9 6 1 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, MI 48192

XII. TRANSPORTATION SERVICES USED

MID072790710 MID096963194
MID000820365 MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Ignitable sludge from automobile production; mixture of paint, primer, water and suspended solids.	0 1	D 0 0 1	7 2 0 0	P
2					
3	E.P. Toxic sludge from automobile production; mixture of oils, suspended solids and water.	1 5	D 0 0 7 D 0 0 8	2 4 0 0 0	P
4					
5	Ignitable liquid from automobile production; mixture of gasoline, diesel fuel, water and suspended solids.	0 1	D 0 0 1	8 0 0 0	P
6					
7	Listed sludge from automobile production; mixture of zinc phosphating sludges.	1 5	F 0 0 6	2 3 5 2 8 7	P
8					
9	E.P. Toxic liquid from automobile production; mixture of oils, suspended solids and water.	1 5	D 0 0 8 D 0 0 7	2 7 7 2 0	P
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Paint Primer Tank Sludge, Oil Sludge, Secondary Containment Tanks, Bonderite Sludge, Cutting Oil Sludge.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met Services, Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, MI 48192

XII. TRANSPORTATION SERVICES USED

MID072790710 MID096963194
MID000820365 MID059695452

XIII. WASTE IDENTIFICATION

Sequence #		A. Description of Waste	B. Total Hazard Rating	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	Ignitable, listed solid from automobile production; mixture	1 5	D 0 0 1 F 0 0 5	5 2 8	P
	2	of paint solids, cellosolve acetate, methyl ethyl ketone				
	3	methyl cellosolve and toluene.				
	4	E.P. Toxic liquid from automobile production; mixture of	1 5	D 0 0 7	1 2 9 0 4	P
	5	detergent, oil and water.				
	6	Ignitable sludge from automobile production; mixture of	0 1	D 0 0 1	1 6 0 9 3	P
	7	polymer wax and petroleum distillates.				
	8	E.P. Toxic spent photographic developing solution from copy-	1 5	D 0 0 6 D 0 1 1 D 0 0 8	8 4 2	P
	9	ing machines; mixture with suspended solids.				
	10	Ignitable, E.P. Toxic, listed liquid from automobile produc-	0 1	D 0 0 1 D 0 0 8 F 0 0 3 F 0 0 5	4 6 8	P
	11	tion; mixture of iso-propanol, ethyl acetate, toluene and cel-				
	12	losolve acetate.				

XIV. COMMENTS (enter information by section number—see instructions)

Sample #s 36C, Composite T (Soap), Sample 34C (Wax), Spent Photographic Developing Fluid, Sample # 86C.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 9 4 (EAE)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI, 48192

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	IGNITABLE, LISTED, E.P. TOXIC SLUDGE FROM AUTOMOBILE PRODUCT-	0 8	D 0 0 1 / D 0 0 6 / D 0 0 8 / D 0 0 9	1 5 2 5 7 6	P
	2	ION; MIXTURE OF POLYMER RESINS, STYRENE AND METHYLENE CHLORIDE.		F 0 0 2		
	3	E.P. TOXIC SLUDGE FROM AUTOMO-		D 0 0 4 / D 0 0 7		
	4	BILE PRODUCTION; MIXTURE OF LUBRICANT GREASES.	1 5	D 0 0 8 / D 0 0 9	3 3 8 8	P
	5	CORROSIVE SOLID FROM AUTOMOBILE		D 0 0 2		
	6	PRODUCTION; MIXTURE OF CAUSTIC POWDERS.	0 2		7 4 0	P
	7	CORROSIVE LIQUID FROM AUTOMO-		D 0 0 2		
	8	BILE PRODUCTION; DETERGENT SOLUTION.	0 2		4 6 2	P
	9	CORROSIVE, E.P. TOXIC LIQUID		D 0 0 2 / D 0 0 7		
	10	FROM AUTOMOBILE PRODUCTION; MIXTURE OF EMULSIFIED OILS,	0 2		7 2 3	P
	11	CAUSTIC SALTS AND AN AQUEOUS SOLUTION.				
	12					

XIV. COMMENTS (enter information by section number—see instructions)

POLYESTER RESIN (COMPOSITE W), GREASE (COMPOSITE F), SAMPLE # 93C, 8E, 12E.

DO NOT make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G | M I D 0 0 5 3 5 6 8 9 4 | DATE 1 1 | (1 2 ... 13 14 15)

X. FACILITY'S EPA I.D. NO.

F | M I D 0 9 6 9 6 3 1 9 4 | (10 ... 21)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI, 48192

XII. TRANSPORTATION SERVICES USED

MID059095452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	REACTIVE SOLID FROM AUTOMOBILE PRODUCTION; MIXTURE OF ORGANIC	1,6	D,0,0,3		5,1,7	P
	2	SALTS.					
	3	E.P. TOXIC SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF AN	1,5	D,0,0,7		1,1,3,1	P
	4	AQUEOUS SOLUTION, GASOLINE AND GREASE.					
	5	E.P. TOXIC SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF	1,5	D,0,0,7	D,0,0,8	5,0,0,5	P
	6	INORGANIC SALTS AND AN AQUEOUS SOLUTION.					
	7	E.P. TOXIC SPENT PHOTOGRAPHIC DEVELOPMENT SOLUTION FROM	1,5	D,0,0,6 D,0,1,1	D,0,0,8	8,4,2	P
	8	COPIERS, MIXED WITH SUSPENDED SOLIDS.					
	9	E.P. TOXIC SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF	1,5	D,0,0,7		7,8,1,6,0	P
	10	POLYOL, ISOCYANATE AND OIL					
	11	CORROSIVE SOLID FROM AUTOMOBILE PRODUCTION; MIXTURE OF CAUSTIC	0,2	D,0,0,2		2,7,3,7	P
	12	SOLIDS.					

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE #S 14E, 20E, LUBRITE SLUDGE (LAB # 2074-83#1), SAMPLE # 3E, LAB # 2170-83, SAMPLE # 31E

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 9 4 (T A C 1)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI, 48192

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Inc	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	CORROSIVE, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION;	0 2	D 0 0 2	D 0 0 8	2 5 9 6	P
	2	MIXTURE OF INORGANIC OILS, EMULSIFIED OILS AND AN AQUEOUS					
	3	SOLUTION.					
	4	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 8	F 0 0 3	5 0 6	P
	5	OF AN AQUEOUS DETERGENT SOLUTION, INORGANIC SALTS, EMULSIFIED OILS,		F 0 0 5			
	6	TOLUENE, ETHYL BENZENE AND XYLENE.					
	7	E.P. TOXIC INORGANIC SALTS FROM AUTOMOBILE PRODUCTION.	1 5	D 0 0 5		1 2 8 2	P
	8	CORROSIVE MIXED CAUSTIC SALTS FROM AUTOMOBILE PRODUCTION.	0 2	D 0 0 2		7 9 9	P
	9	IGNITABLE LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF PETROLEUM	0 8	D 0 0 1		4 2 4	P
	10	DISTILLATES AND AN AQUEOUS SOLUTION.					
	11	CORROSIVE SURFACTANT SOLUTIONS FROM AUTOMOBILE PRODUCTION,	0 2	D 0 0 2	D 0 0 8	3 0 0 3	P
	12	ALSO E.P. TOXIC.					

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE 41E, 44E, 50E, 53E, 54E, 61E

Tear Here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI, 48192

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 9 6 3 1 9 4

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	IGNITABLE SLUDGE FROM AUTOMOBILE	0 8	D 0 0 1	1,5,6,2	P
	2	PRODUCTION; MIXTURE OF RESINS, POLYMERS, STYRENE AND ETHANOL.				
	3	IGNITABLE, LISTED LIQUID FROM	0 8	D 0 0 1 F 0 0 1	3 7 4	P
	4	AUTOMOBILE PRODUCTION; MIXTURE OF PETROLEUM DISTILLATES AND 1,1,1 TRICHLOROETHANE.				
	5	IGNITABLE LIQUID FROM AUTOMOBILE	0 1	D 0 0 1	3 5 2	P
	6	PRODUCTION; MIXTURE OF PETROLEUM DISTILLATES AND NAPTHA.				
	7	CORROSIVE SOLID FROM AUTOMOBILE	0 2	D 0 0 2	4 9 0	P
	8	PRODUCTION; MIXTURE OF CAUSTIC SOLIDS AND NAPTHA.				
	9	CORROSIVE SOLID FROM AUTOMBILE	0 2	D 0 0 2	5 0 1	P
	10	PRODUCTION; MIXTURE OF CAUSTIC SOLIDS AND NAPTHA.				
	11	E.P. TOXIC OILS FROM AUTOMOBILE	1 5	D 0 0 8	4 3 5	P
	12	PRODUCTION.				

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE #S 73E, 62E, 65E, 66E, 67E, 63E.

DO NOT MAKE ENTRIES IN SHADED AREAS

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 (1-12)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 9 6 9 6 3 1 9 4 (10-28)

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MICHIGAN, 48192

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	CORROSIVE SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF ABRASIVES	0 2	D 0 0 2	2,4,6,4	P
	2	AND A CAUSTIC SOLUTION.				
	3	CORROSIVE LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF NITRIC	0 2	D 0 0 2	6,8,0	P
	4	ACID, PHOSPHORIC ACID AND AN AQUEOUS SOLUTION.				
	5	CORROSIVE SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF CAUSTIC	0 2	D 0 0 2	6,8,0	P
	6	SODA ASH, NITRIC ACID, PHOS-				
	7	PHORIC ACID AND AN AQUEOUS SOLUTION.				
	8	IGNITABLE WINDSHIELD WASHER FLUID FROM AUTOMOBILE PRODUCTION;	0 1	D 0 0 1 F 0 0 3	4,6,2	P
	9	MIXTURE OF METHANOL, PIGMENTS				
	10	AND AN AQUEOUS SOLUTION. E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION; MIXED POLYMERS.	1,5	D 0 0 7	1,2,1,0	P
	11	IGNITABLE LIQUID FROM AUTOMO-		D 0 0 1		
	12	BILE PRODUCTION; MIXTURE OF PETROLEUM DISTILLATES.	0,8		6,6,0	P

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE # 68E, CHEM-FOS 107-FA, CHEM-FOS 107FA (NEUTRALIZED), WINDSHIELD WASHER SOLVENT (LAB # 1571-82 # 6), SAMPLE #S 87E, 88E.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 (1 2 ... 13 14 15)

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 9 6 3 1 9 4 (1 ... 10 ... 20)

XII. TRANSPORTATION SERVICES USED

MID059695452

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MI, 48192

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
28 32	1	E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF	1 5 (33 34)	D 0 0 7 (35 38)	(39 42)	3,4,1 (51 59)	P (60)
	2	OILS AND AN AQUEOUS SOLUTION.		(43 46)	(47 50)		
	3	CORROSIVE SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF	0 2	D 0 0 2		1,2,6,5	P
	4	OILS, INORGANIC SALTS AND AN AQUEOUS SOLUTION.					
	5	CORROSIVE SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF	0 2	D 0 0 2		1,2,4,3	P
	6	OILS, INORGANIC SALTS AND AN AQUEOUS SOLUTION.					
	7	CORROSIVE, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION;	0 2	D 0 0 2 D 0 0 8	D 0 0 6	7,7,4	P
	8	MIXTURE OF CAUSTIC SOLUTIONS.					
	9	IGNITABLE, E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF OILS, AN AQUEOUS SOLUTION, TOLUENE, METHYL ISOBUTYL KETONE AND METHYL ETHYL KETONE.	0 1	D 0 0 1 F 0 0 3	D 0 0 7 F 0 0 5	8,3,6	P
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE #S 89E, 90E, 91E, 94E, 95E.

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C I [illegible] 1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 6 9 6 3 1 9 4
10 20

XI. FACILITY ADDRESS
18550 ALLEN ROAD
WYANDOTTE, MI, 48192

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #		A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
29 12	1	IGNITABLE LIQUID FROM AUTOMOBILE PRODUCTION, MIXTURE OF OILS AND	0 1	D 0 0 2		6 9 3	P
	2	PETROLEUM DISTILLATES.					
	3	E.P. TOXIC SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF OILS,	1 5	D 0 0 7		7 3 7	P
	4	INORGANIC SALTS, AND AN AQUEOUS SOLUTION.					
	5	IGNITABLE, LISTED SOLID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 1	F 0 0 1		
	6	OF OILS, RESINS, INORGANIC SALTS, METHYLENE CHLORIDE, METHANOL,		F 0 0 2	F 0 0 3	2 8 1	P
	7	ISO PROPANOL, 1,1,1 TRICHLOROETHANE, TRICHLOROETHYLENE,		F 0 0 5			
	8	TOLUENE AND XYLENE.					
	9	E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF OILS,	1 5	D 0 0 6	D 0 0 7		
	10	INORGANIC SALTS, AND AN AQUEOUS SOLUTION.		D 0 0 8		5 5 0	P
	11	IGNITABLE, LISTED SLUDGE FROM AUTOMOBILE PRODUCTION;MIXTURE OF	0 8	D 0 0 1	F 0 0 5		
	12	TOLUENE, INORGANIC SALTS, CELLOSOLVE ACETATE, ETHYL CELLOSOLVE AND AN AQUEOUS SOLUTION.				1 4 5 7	P

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE #S 96E, 100E, 116E, 117E, 119E.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 6 9 6 3 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MICHIGAN, 48192

XII. TRANSPORTATION SERVICES USED

MID059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. [illegible] Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
22	1	IGNITABLE, LISTED LIQUID FROM AUTOMOBILE PRODUCTION, MIXTURE	0 1	D 0 0 1 F 0 0 5	4 4 6	P
	2	OF ADHESIVES, TOLUENE AND AN AQUEOUS SOLUTION.				(2)
	3	IGNITABLE LIQUID FROM AUTOMOBILE		D 0 0 1		
	4	PRODUCTION; MIXTURE OF PETROLEUM DISTILLATES.	0 1		3 8 0	P
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

SAMPLE #S 120E, 125E.

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 1 (I.R.C.)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEMICAL RECOVERY SYSTEMS, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 0 6 0 9 7 5 8 4 4

XI. FACILITY ADDRESS

36345 VAN BORN ROAD
ROMULUS, MICHIGAN, 48174

XII. TRANSPORTATION SERVICES USED

MID059095452, MID060975844

XIII. WASTE IDENTIFICATION

Sequence #		A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	LISTED LIQUID FROM AUTOMOBILE PRODUCTION, MIXTURE OF 1,1,1	1 5	F 0 0 1	7 3 5 3	P
	2	TRICHLOROETHANE, OILS, SUSPENDED SOLIDS, WATER AND 1,2 DICHLORO-				
	3	ETHANE.				
	4	LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF METHYL-	1 5	F 0 0 2	1 8 5 6 4	P
	5	ENE CHLORIDE, POLYMER SOLIDS AND STYRENE.				
	6	IGNITABLE, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	0 8	D 0 0 1 F 0 0 5		
	7	OF TOLUENE AND PAINT PIGMENTS.			5 1 3 3 2 4	P
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

1,1,1 TRICHLOROETHANE (2338-83#5), METHYLENE CHLORIDE (1499-82 #4), BULK THINNER (1571-82 # 16)

DO NOT MAKE ENTRIES IN SHADED AREAS

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 1 (DAT)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENVIRONMENTAL WASTE CONTROL, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 PRINCETON
INKSTER, MI, 48141

XII. TRANSPORTATION SERVICES USED

MID056988892, MIT270013683, MID057002602

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. [D]ensity / Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	E.P. TOXIC, LISTED OIL FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 7 D 0 0 8 F 0 0 1	3 2 8 3 8 6 1	P
	2	OF OILS, SUSPENDED SOLIDS, 1,1,1 TRICHLOROETHANE AND WATER.				
	3	IGNITABLE LIQUID FROM AUTOMOBILE PRODUCTION, MIXTURE OF OIL,	0 1	D 0 0 1	1 3 6 5 8 0	P
	4	ETHYLENE GLYCOL, PETROLEUM DISTILLATES, WATER AND SUSPENDED				
	5	SOLIDS.				
	6	IGNITABLE LIQUID FROM AUTOMOBILE PRODUCTION, MIXTURE OF	0 8	D 0 0 1	7 9 2 0	P
	7	GASOLINE, DIESEL FUEL, WATER AND SUSPENDED SOLIDS.				
	8	IGNITABLE SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF	0 1	D 0 0 1 D 0 0 5 D 0 0 6 D 0 0 7	4 6 2 0 0	P
	9	PETROLEUM DISTILLATED AND PIGMENTS, ALSO E.P. TOXIC.		D 0 0 8		
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

BLDG. 28 OIL (LAB # 1486-82 #3), SECONDARY CONTAINMENT PITS (LAB # 1519-82#1, 1519-2 #2, AND 1519-82 #3), GASOLINE AND BLDG. 37 DIP PAINT PROCESS SLUDGE (2002-83 #1)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 9 4 1 1 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

GENERAL OIL COMPANY

X. FACILITY'S EPA I.D. NO.

M I D 0 4 7 1 8 9 5 6 8

XI. FACILITY ADDRESS

12680 BEECH DALY ROAD
REDFORD, MI, 48239

XII. TRANSPORTATION SERVICES USED

MID980791529 AND MID099658288

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 7	D 0 0 8	2 4 2 8 0 6	P
	2	OF OILS, SUSPENDED SOLIDS, WATER AND 1,1,1 TRICHLORETHANE					
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

BLDG. 28 OIL (1486-82 # 3) - THIS MATERIAL IS A SLUDGE, BY DEFINITION, SOLD AND RECYCLED FOR BENEFICIAL USE.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

GM1D005356891417

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MCKESSON ENVIROSYSTEMS COMPANY

X. FACILITY'S EPA I.D. NO.

ILD098130613913

XI. FACILITY ADDRESS

633 EAST 138TH STREET
DOLTON, IL, 60419

XII. TRANSPORTATION SERVICES USED

MID000820365 AND KYD053348108

XIII. WASTE IDENTIFICATION

Sequence #		A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	IGNITABLE, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	0 8	D 0 0 1 F 0 0 5	4 1 5 1 0 0	P
	2	OF TOLUENE AND PAINT PIGMENTS.				
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

BULK THINNER (1571-82 # 6)

Tear out here

42-590 O—85——58

DO NOT MAKE ENTRIES IN SHADED AREAS

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 (1-12) T A C (13-15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MCKESSON CHEMICAL COMPANY

X. FACILITY'S EPA I.D. NO.

K Y D 0 5 3 3 4 8 1 0 8 (16-28)

XI. FACILITY ADDRESS

STATE HIGHWAY 146, P.O. BOX 406
NEW CASTLE, KY, 40050

XII. TRANSPORTATION SERVICES USED

KYD053348108 AND MID980681690

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code (11-14)	C. EPA Hazardous Waste No. (see instructions) (35-42)	D. Amount of Waste (43-50)	E. Unit of Measure (51)
29	1	LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF	1 5	P 0 0 2	2 9 5 1 6 7	P
	2	METHYLENE CHLORIDE, POLYMER SOLIDS AND STYRENE.				
	3	IGNITABLE, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	0 8	D 0 0 1 F 0 0 5	4 2 0 0 0	P
	4	OF TOLUENE AND PAINT PIGMENTS.				
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

METHYLENE CHLORIDE (1499-82 #4), BULK THINNER (1571-82 #16)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G	M	1	0	0	1	5	1	5	6	8	9	4	1	1
1	2											13	14	15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

OLDSMOBILE DIV. GMC.

X. FACILITY'S EPA I.D. NO.

F	M	I	0	9	8	0	7	0	0	8	4	3
16												28

XI. FACILITY ADDRESS

2901 S. CANAL ROAD - PLANT 5
LANSING, MICHIGAN, 48921

XII. TRANSPORTATION SERVICES USED

MID980791529

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	15	D007 D008 F001	166540	P
	2	OF OILS, SUSPENDED SOLIDS, WATER AND 1,1,1 TRICHLOROETHANE.				
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

BLDG. 28 OIL (LAB # 1486-82 #3) SENT FOR RECLAIM PURPOSES.

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 (DAL) 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

PETRO CHEM PROCESSING, INC.

X. FACILITY'S EPA I.D. NO.

F M I D 9 8 0 6 1 5 2 9 8

XI. FACILITY ADDRESS

421 LYCASTE
DETROIT, MI, 48214

XII. TRANSFORTATION SERVICES USED

MID000820365 AND MID099658288

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. TSC Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	IGNITABLE, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	0 8	D 0 0 1 F 0 0 5	1 4 7 0 0	P
	2	OF TOLUENE AND PAINT PIGMENTS.				
	3	IGNITABLE LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF GASOLINE	0 8	D 0 0 1	2 7 6 2 0	P
	4	DIESEL FUEL, WATER AND SUSPENDED SOLIDS.				
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

BULK THINNER (1571-82 #16), GASOLINE

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 (1 1) (1 2 13 14 15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

TITAN OIL COMPANY

X. FACILITY'S EPA I.D. NO.

F I N D 0 0 0 6 4 6 9 5 0 (16 20)

XI. FACILITY ADDRESS

1509 S. SENATE
INDIANAPOLIS, IN, 46225

XII. TRANSPORTATION SERVICES USED

MID056988892 AND MIT270013683

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. (TX) Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
28 32	1	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5 (33 34)	D 0 0 7 (35 39) D 0 0 8 (40 42)	7 0 7 5 7 0 (43 49)	P (50)
	2	OF OILS, SUSPENDED SOLIDS, WATER AND 1,1,1 TRICHLOROETHANE.		(46 47) (50 51)	(51 59)	(60)
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

BLDG. 28 OIL (1486-82 # 3)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 8 9 4 (1-15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL, SITE # 2

X. FACILITY'S EPA I.D. NO.

F M I D 0 4 8 0 9 0 6 3 3 (16-28)

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE
BELLEVILLE, MICHIGAN, 48111

XII. TRANSPORTATION SERVICES USED

MID059695452 AND MID086148202

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29-30	1	CORROSIVE SOLIDS FROM AUTOMOBILE PRODUCTION; MIXTURE OF	0 2 (11-14)	D 0 0 2 (35-42)	4 7 3 9 6 4 (51-59)	P (60)
	2	CAUSTIC PAINT STRIPPING SALTS.				
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

PAINT STRIPPING SALTS (KOLENE)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4 1 1 7

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. TOCI (pounds)	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	CORROSIVE SOLID FROM AUTOMOBILE PRODUCTION; MIXTURE OF CAUSTIC	0.2	D002	5588	P
	2	PAINT STRIPPING SALTS.				
	3	LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF METHYLENE	1.5	F002	572	P
	4	CHLORIDE, POLYMER SOLIDS AND STYRENE.				
	5	TOXIC, REACTIVE SOLIDS FROM AUTOMOBILE PRODUCTION, SOLUBLE	1.8	D003	300	P
	6	CYANIDE SALTS.				
	7	IGNITABLE, LISTED, E.P. TOXIC		D001 D008		
	8	LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF TOLUENE, ETHYL	0.8	F003 F005	1810	P
	9	BENZENE, XYLENE, AND RESINS.				
	10	E.P. TOXIC SLUDGE FROM AUTOMOBILE PRODUCTION; MIXTURE OF POLYOL, ISOCYANATE AND OIL.	1.5	D007	3080	P
	11	LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE OF OILS,	1.5	F001	3784	P
	12	1,1,1 TRICHLOROETHANE, WATER AND 1,2 DICHLOROETHANE.				

XIV. COMMENTS (enter information by section number—see instructions)

1983 GENERATED - STORED ON SITE LESS THAN 90 DAYS AS OF DECEMBER 31, 1983.

PAINT STRIPPING SALTS (KOLENE), METHYLENE CHLORIDE (1499-82 #4), SAMPLE # 53C, THINNER (COMPOSITE S), LAB #2170-83, 1,1,1 TRICHLOROETHANE (LAB # 2338-83 #5)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983

Date rec'd _____ Rec'd by _____

VIII. GENERATOR'S EPA I.D. NO.

C M T D 0 5 3 5 6 8 9 4 (T A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

X. FACILITY'S EPA I.D. NO.

XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (DOT) Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	CORROSIVE, E.P. TOXIC LIQUID FROM AUTOMOBILE PRODUCTION;	8	D 0 0 8	7 0 4	P
2	MIXTURE OF ACID SOLUTIONS.				
3	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 8 F 0 0 1 F 0 0 2	8 2 5	P
4	OF OILS, GREASE, METHYLENE CHLORIDE AND 1,1,1 TRICHLOROETHANE.				
5	E.P. TOXIC WATER SOLUBLE OILS FROM AUTOMOBILE PRODUCTION.	1 5	D 0 0 8	4 6 7	P
6	E.P. TOXIC, LISTED LIQUID FROM AUTOMOBILE PRODUCTION; MIXTURE	1 5	D 0 0 8 F 0 0 1 F 0 0 3 F 0 0 5	4 6 7	P
7	OF AQUEOUS SOLUTIONS WITH 1,1,1 TRICHLORETHANE, TETRACHLORO-				
8	ETHANE, BENZENE, TOLUENE, ETHYL BENZENE AND XYLENES.				
9	E.P. TOXIC LIQUID FROM AUTOMO-	1 5	D 0 0 8		
10	BILE PRODUCTION; MIXTURE OF ANTI-FREEZE, ETHYL GLYCOL AND WATER.			1 0 0 1	P
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

1983 GENERATED - STORED ON-SITE LESS THAN 90 DAYS AS OF DECEMBER 31, 1983.

SAMPLE #S 144E, 145E, 146E, 152E, 153E.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 9 4

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. TSDF Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	E.P. TOXIC, LISTED LIQUID FRO	1 5	D 0 0 8 F 0 0 1		
29	32	AUTOMOBILE PRODUCTION; MIXTURE		F 0 0 3 F 0 0 5	6 2 2	P
	2	OF AN AQUEOUS SOLUTION, 1,1,1		F 0 0 2		
	3	TRICHLOROETHANE, TETRACHLORO-				
	4	ETHENE, TOLUENE, ETHYL BENZENE				
	5	AND XYLENES.				
	6	E.P. TOXIC, LISTED LIQUID FROM		D 0 0 8 F 0 0 1		
	7	AUTOMOBILE PRODUCTION; MIXTURE	1 5	F 0 0 2 F 0 0 5	6 0 5	P
	8	OF 1,1,1 TRICHLOROETHANE, TOLUENE,				
	9	1,1 DICHLOROETHENE, TETRACHLORO-				
	10	ETHENE.				
	11					
	12	LISTED LIQUID FROM AUTOMOBILE		F 0 0 1 F 0 0 2		
	13	PRODUCTION; MIXTURE OF METHYLENE	1 5	F 0 0 3 F 0 0 5	1 7 1 6 0	P
	14	CHLORIDE, GLUES, METHANOL, 1,1,1				
	15	TRICHLOROETHANE, N-BUTANOL,				
	16	METHYL ISOBUTYL KETONE, TOLUENE				
	17	AND RESINS.				
	18					
	19					
	20					
	21					
	22					
	23					
	24					

XIV. COMMENTS (enter information by section number—see instructions)

1983 GENERATED - STORES ON-SITE LESS THAN 90 DAYS AS OF DECEMBER 31, 1983.

SAMPLE #S 154E, 155E AND 157E.

should read 83

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
LAND PROGRAM
19 84 Hazardous Waste Generator and On-Site TSD Facility Annual Report

NOTE: Read all instructions prior to completing this form.

I. Installation EPA ID Number: ALD004014753

II. Name of Installation: Rochester Products Division of GMC

III. Location of Installation: 3440 Kauloosa Avenue (Street or Route Number)

Tuscaloosa (City or Town) | Tuscaloosa (County) | Alabama (State) | 35401 (Zip Code)

IV. Installation Contact: Ronald W. Jacobs (Name) (205) 345-0000 ext. 207 (Area Code) (Telephone Number)

V. Waste Identification:

Line Number	A. EPA Waste Number	B. Description of Waste	C. Quantity Generated (LBS)	D. Amount of Waste by Handling Method: 1. Handling Method Code	2. Quantity Stored, Treated Disposed, or Recovered On-Site	Shipped to Off-Site Treatment Disposal, or Recovery Facility: 3. Quantity	4. Facility EPA ID No./Recovery Facility Name
1.							
2.		NO SHIPMENTS FROM THIS PLANT IN 1983					
3.							
4.							
5.							

(If more space is needed, check ☐ and complete Attachment 1)

VI. Closure Cost Estimate for Facilities $ 39,100

VII. Cost Estimate for Post-Closure Monitoring and Maintenance (Disposal Facility Only) $ NA

VIII. Certification:

T. P. Gilligan (Signature) | Thomas P. Gilligan (Print or Type Name) | Plant Manager (Title)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

IOWA DEPARTMENT OF WATER, AIR AND WASTE MANAGEMENT *Rec'd was mailed 2/6/84*

HAZARDOUS WASTE PROGRAM

BIENNIAL HAZARDOUS WASTE REPORT

FOR CALENDAR YEAR 1983

SECTION A - HAZARDOUS WASTE OPERATION CATEGORY

(select the category which describes your operation)

CATEGORY

1 A hazardous waste generator that ships waste off-site within 90 days of generation, and does not treat, store or dispose of waste on-site.

2 A hazardous waste generator that also treats, stores 1000 kg. or more for more than 90 days, or disposes of all of generated waste on-site.

3 A hazardous waste generator that ships some generated waste off-site within 90 days of generation, and also treats, stores 1000 kg. or more for more than 90 days, or disposes of some generated waste on-site.

4 A facility that does not generate hazardous waste, but treats, stores or disposes of hazardous waste on-site.

ENTER CATEGORY HERE => 3

SECTION B - TO BE COMPLETED BY CATEGORIES 1, 2 AND 3

1. You are not required to report as a hazardous waste generator under any of the following conditions. Check the block that meets the definition of your operation, if appropriate.

☐ NON-HANDLER Did not handle hazardous waste in any quantity during the calendar year 1983.

☐ SMALL-QUANTITY GENERATOR Did not generate more than 1000 kg. of hazardous waste (or more than 1 kg. of acutely hazardous waste) in any single month, or accumulate more than 1000 kg. of hazardous waste (or more than 1 kg. of acutely hazardous waste) on-site at any time during calendar year 1983.

☐ EXEMPT All wastes were generated in farming operations (40 CFR §262.51) or exempt pursuant to 40 CFR §261.4.

☐ BENEFICIAL USE All hazardous waste generated was beneficially used, reused, or recycled on-site prior to transporation or storage of more than 90 days, in accordance with 40 CFR §261.2 and §261.6(a).

☐ CLOSED Installation was closed prior to the beginning of calendar year 1983.
The status of this closed installation is ☐ TEMPORARY/ ☐ PERMANENT

2. ☒ This installation does not qualify for an exemption under 1, above.
(You are required to report as instructed in Section E on the reverse)

SECTION C - TO BE COMPLETED BY CATEGORIES 2, 3 AND 4

1. COST ESTIMATE FOR FACILITY CLOSURE
$ 4,300

2. COST ESTIMATE FOR POST-CLOSURE MONITORING & MAINTENANCE (where applicable)
$ N/A

3. Check here ☐ If your facility did not treat, store or dispose of regulated quantities of hazardous waste during calendar year 1983. Refer to definitions in Section B, above - This exemption was maintained because the facility qualified as:
NON-HANDLER ☐
CLOSED ☐
(Check here ☐ If you wish to formally withdraw your Part A permit application and have not previously done so.)

4. ☒ This facility does not qualify for an exemption under 3., above.
(You are required to report as instructed in Section E on the reverse.)

SECTION D - TO BE COMPLETED BY ALL CATEGORIES

CHIEF EXECUTIVE OFFICER
GENERAL MOTORS CORP-ROCHESTER PROD
1863 ZENITH DR
SIOUX CITY IA 51103

IAD000686899

2. LOCATION OF OPERATION (if different from mailing address)

3. EPA I.D. NUMBER
IAD000686899

4. NAME OF CONTACT PERSON
N. L. Greiner

5. AREA CODE/TELEPHONE NUMBER
712-277-6266

CONTINUED ON REVERSE

IAWM form 76 (Rev 83)

YOUR EPA I.D. NUMBER

PAGE OF PAGES

SECTION E - REPORTING INSTRUCTIONS

Reproduce this page whenever any given listing exceeds 13 line numbers. Enter your I.D. NUMBER on each page used and number the pages in the space provided. Complete Section G only on the original of this page.

CATEGORY 1 Complete an individual Section F for each facility to which you shipped waste during this report period, reproducing this page as necessary, and Section G on the first page only.

CATEGORY 2 Complete item 1 (List your own I.D. number in this item) and item 5 of Section F (reproducing this page as necessary), and Section G on the first page only.

CATEGORY 3 Complete at least 2 reports, prepared as instructed for Categories 1 and 2.

CATEGORY 4 Complete Section F for each generator from which you received waste during the period of this report, reproducing this page as necessary, and complete Section G on the original page only.

SECTION F - HAZARDOUS WASTE MANAGEMENT

Items 1, 2 & 3: List the EPA I.D. number, name & address of the company to which you moved or from which you received hazardous waste.

1. EPA I.D.NUMBER	2. NAME	3. MAILING ADDRESS
NED000610444	Atwood Enterprises, Inc.	Norfolk, Nebraska

4. TRANSPORTATION SERVICES USED - IDENTIFY BY NAME AND EPA I.D. NUMBER

Atwood Enterpirses, Inc. EPA I. D. #NED000610444

5. WASTE IDENTIFICATION
(see attached instructions)

LINE NO.	DESCRIPTION OF WASTE	HAZARDOUS WASTE CODES	HANDLING CODE	AMOUNT OF WASTE (kilograms)
1	Waste - stoddard solvent combustable liquid	D 0 0 1	S 0 2	2,200 Kg.
2	Waste - mixed lubricating oils, combustable liquid	D 0 0 1	S 0 2	1,800 Kg.
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				

SECTION G - CERTIFICATION
(to be completed by all categories)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and any attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME OF AUTHORIZED REPRESENTATIVE (print or type)	TITLE (vice-president or higher authority)
Robert E. Houseworth	Plant Manager

SIGNATURE	DATE

TB/HW-1

November 15, 1985

IOWA DEPARTMENT OF WATER, AIR AND WASTE MANAGEMENT

TECHNICAL BULLETIN

HAZARDOUS WASTE PROGRAM

INSTRUCTIONS FOR COMPLETION OF THE BIENNIAL HAZARDOUS WASTE REPORT

WHEN TO FILE

File the biennial hazardous waste report not later than March 1 of every even-numbered year.

WHERE TO FILE

Mail the report to this Department, Henry A. Wallace Building, 900 East Grand, Des Moines, IA 50319. Do not hesitate to call the Department at 515/281-8936 if you have any problems completing this report. 4076

WHAT TO REPORT

Report all quantities of hazardous waste that your business generated, treated, stored or disposed of from January 1 through December 31 of every odd-numbered year.

Report only those wastes or portions of wastes that are either "characteristic" or "listed", as shown in Appendix A to these instructions.

If any or all of the wastes generated or handled by your operation were "delisted" at some time during the report year, you must still report those wastes for the portion of the year in which they were regulated.

HOW TO REPORT

Complete departmental form 76 as described on the form, discussed in the following paragraphs and illustrated by example on the reverse of this bulletin.

SECTION B

See Appendix B to these instructions for extracts of the cited Code of Federal Regulations, Title 40.

SECTION C

Item 1. Estimate the cost for facility closure as described in 40 CFR §264.142 (facilities which have been issued a permit) or §265.142 (facilities whose permit application is not yet final).

Item 2. Estimate the cost for post-closure monitoring and maintenance as described in 40 CFR §264.144 (facilities which have been issued a permit) or §265.144 (facilities whose permit application is not yet final).

Above cited sections of the Code of Federal Regulations are extracted in Appendix B.

SECTION F

Items 1, 2 and 3 serve to identify the company to which you shipped hazardous waste or from which you received hazardous waste.

Item 4. If you shipped hazardous waste to other companies, list the names and EPA I.D. numbers of the carrier(s) as shown on the manifests.

Item 5 - DESCRIPTION OF WASTE. There are two types of hazardous wastes that you are required to describe in this portion of Item 5:

- Listed Waste. For hazardous wastes that are "listed", enter the listed name, as shown on pages 2 through 21 of Appendix A, abbreviated if necessary. Where mixtures of listed waste were shipped, enter the description which you believe best describes the waste.

- Characteristic Waste. For hazardous waste identified by characteristic (i.e., ignitable, corrosive, reactive or EP toxic), please enter the following: (1) The description from the list on page 1 of Appendix A which you believe best describes the waste; (2) The specific manufacturing or other process generating the waste; and (3) the chemical or generic chemical name of the waste if known.

Item 5 - HAZARDOUS WASTE CODES. For Listed Waste, enter the four-character code as shown on pages 2 through 21 of Appendix A. For Characteristic Wastes which exhibit hazardous characteristics, enter the four-character code as shown on page 1 of Appendix A.

For a mixture of more than one Listed or Characteristic Waste, enter all of the relevant codes. Space for six identifier codes is provided for each waste described. If more than six identifier codes are needed, continue on the next line and leave all other items on that line blank.

Item 5 - HANDLING METHOD CODE. This column is to be completed only if you treat, store or dispose of hazardous waste. Enter one handling method code for each waste line entry. Where several handling steps have occurred during the year, report only the handling code representing the waste's status at the end of the reporting year, or its final disposition. If a different handling code applies to portions of the same waste (e.g., part of the waste was stored while the remainder was incinerated during the year), use a separate line entry for each portion.

Storage
S01 Container (barrel, drum, etc.)
S02 Tank
S03 Waste Pile
S04 Surface Impoundment
S05 Other (specify by attachment)

CONTINUED ON REVERSE

TB/HW-1

November 15, 1983

INSTRUCTIONS FOR COMPLETION OF THE BIENNIAL HAZARDOUS WASTE REPORT (continued)

Treatment
- T01 Tank
- T02 Surface Impoundment
- T03 Incinerator
- T94 Thermal treatment not occurring in tanks, surface impoundments or incinerators
- T95 Chemical treatment not occurring in tanks, surface impoundments or incinerators
- T96 Physical separation of components not occurring in tanks, surface impoundments or incinerators
- T97 Physical removal of specific components not occurring in tanks, surface impoundments or incinerators
- T98 Biological treatment not occurring in tanks, surface impoundments or incinerators

Disposal
- D79 Injection Well
- D80 Landfill
- D81 Land Application
- D82 Ocean Disposal
- D83 Surface Impoundment
- D84 Other (specify by attachment)

Example: Reporting a "characteristic" waste.

5. WASTE IDENTIFICATION (see attached instructions)						
LINE NO.	DESCRIPTION OF WASTE	HAZARDOUS WASTE CODES			HANDLING CODE	AMOUNT OF WASTE (kilograms)
1	Ignitable spent solvent used in widget production; mixture of	D 0 1				63400
2	mineral spirits and kerosene					

Example: Reporting waste mixtures

1	Chlorinated distillation residues	K_{0} 1 6	K_{0} 1 8	K_{0} 1 9	T_{0} 1	29900
		K_{0} 2 0	K_{0} 2 3	K_{0} 2 4		
2		K_{0} 2 7				

Example: Reporting multiple handling method codes

1	Propargyl alcohol	P_{1} 0 2			S_{0} 1	16520
2	Propargyl alcohol	P_{1} 0 2			T_{9} S_{5}	780

APPENDICES
- A - Hazardous Waste Codes
- B - Extract of CFR - Title 40

Do not make entries in shaded areas

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T A C

F	M	I	D	0	0	0	7	2	1	7	3	8		1
1	2											13	14	15

III. NAME OF INSTALLATION

GMC ROCHESTER PRODUCTIVITY CENTER

30 69

IV. INSTALLATION MAILING ADDRESS

3210 BURLINGAME

15 16 45

Street or P.O. Box

4GRAND RAPIDS MI 49510

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5999 RANDALL

15 16 45

Street or Route number

6COOPERSVILLE MI 49404

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

2BLOUW RONALD

15 16 45

Name (last and first)

6 1 6 - 2 4 7 - 5 2 0 1

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

D. STEPANOVICH, MANAGER _____ 2-15-84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G	M	I	D	0	0	0	7	2	3	7	3	8		1
1	2										13	14	15	

X. FACILITY'S EPA I.D. NO.

F	M	I	D	9	9	0	8	5	8	0	0	3
16												28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ORGANIC CHEMICALS, INC.

XI. FACILITY ADDRESS

3291 CHICAGO DRIVE
GRANDVILLE, MICHIGAN 49418

XII. TRANSPORTATION SERVICES USED

SPARTAN CHEMICAL MID079300125
2539 28TH ST.
WYOMING, MICHIGAN 49509

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	SPENT FREON (CHLORINATED FLURO-CARBONS) SOLVENT USED IN AUTO-MOTIVE PARTS DEGREASING	33 34	F 0 0 1 35 38 39 42	6 6 5 6 43 46 47 50 51 59	G 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

T A C

FMI0I1I7I0I7I9I6I2I5 T T
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

ROCHESTER PRODUCTS DIV GMC
30 69

IV. INSTALLATION MAILING ADDRESS

3200 BURLINGAME
15 16 45
Street or P.O. Box

GRAND RAPIDS MI 49505
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5
15 16 45
Street or Route number

6
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

ZICKENS ROBERT
15 16 45
Name (last and first)

616-247-5202
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. T. KORTE PLANT MANAGER R T Korte 2/10/84
Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A (5-80) (Revised 11-83)

42-590 O—85——59

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C
MIDO17079625 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

NELSON INDUSTRIAL SERVICES

X. FACILITY'S EPA I.D. NO.

FMIDO98011992

XI. FACILITY ADDRESS

12345 SCHAEFER HWY.
DETROIT, MICHIGAN

XII. TRANSPORTATION SERVICES USED

NELSON INDUSTRIAL SERVICES MID098011992
VALLEY CITY REFUSE INC. MID055875373

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	CYANIDE CONTAMINATED DEBRIES OR MUD FROM PLATING BATHS	8	D008 D006	30	T
	2	WASTE CHROMIC ACID MIXTURE LIQUID FROM PLATING	8	D007	24	T
	3	WASTE CYANIDE SOLUTION FROM PLATING OPERATION	8	D003 D006	276	T
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I D 0 1 1 7 0 1 7 9 6 2 5 (1 2) (13 14 15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

METAL WORKING LUBRICANTS

X. FACILITY'S EPA I.D. NO.

F I N D 0 0 0 6 4 6 9 5 0 (16 28)

XI. FACILITY ADDRESS

1509 SOUTH SENATE AVE.
INDIANAPOLIS, INDIANA 46225

XII. TRANSPORTATION SERVICES USED

YODER TRUCK LINES MIT270013683
VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	WASTE OIL SOLD TO RECLAIMER	0 1 (33 34)	D 0 0 1 (35 38) (39 42)	1 9 0 0 (43 46) (47 50) (51 59)	T (60)
	2	OILY RAG SLUDGE FROM WATER TREATMENT	0 1	D 0 0 1	2 0	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd _____ Rec'd by _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I I D 1 0 1 1 7 1 0 1 7 1 9 1 6 1 2 1 5 [ ] [ ]
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

TRICIL

X. FACILITY'S EPA I.D. NO.

F M I D 0 7 2 5 8 5 7 5 5
16 28

XI. FACILITY ADDRESS

3030 WOOD ST.
MUSKEGON HTS. MICHIGAN 49444

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE, INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	OILY RAG SLUDGE FROM WASTEWATER TREATMENT	33 34	D 0 0 1 35 38 / 43 46	39 42 / 47 50 / 1 9 51 59	T 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date Rec'd ____ Rec'd By ____

VIII. GENERATOR'S EPA I.D. NO.

MID 117017962 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MICHIGAN DISPOSAL

X. FACILITY'S EPA I.D. NO.

FMID007248313

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE
BELLEVILLE, MICHIGAN

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29-32	1	SLUDGE FILTER CAKE FROM WASTE-WATER TREATMENT	15	F006	116	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Received by: Read by:

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 1 7 0 7 9 6 2 5 (T)(A)(C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WAYNE DISPOSAL II

X. FACILITY'S EPA I.D. NO.

(F) M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 N. SERVICE DRIVE
BELLEVILLE, MICHIGAN

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	SLUDGE FILTER CAKE FROM WASTE-WATER TREATMENT		D 0 0 6	1 4 1 0 1 0	T
	2	WASTE GREASE FROM COLD FORMING OPERATION		D 0 0 8	2 6	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

On Rec'd by

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M I I D 0 1 1 7 0 1 7 9 6 2 1 5 [ ] [1]

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

GRANGER LAND DEVELOPMENT

X. FACILITY'S EPA I.D. NO.

F M I D 0 8 2 7 7 1 7 0 0

16 28

XI. FACILITY ADDRESS

8550 W. GRAND RIVER

GRAND LEDGE, MICHIGAN 48837

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Sequence No.	Line	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	WASTE GREASE FROM COLD FORMING OPERATION	1, 5 (33 34)	D 0 0 8 (35 38)	8 (51 59)	T (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ONE SHIPMENT, MARCH OF 83. RPD NO LONGER USES THIS FACILITY.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd ____ Rec'd by ____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 1 1 7 0 7 9 6 2 5 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

AMERICAN CHEMICAL SERVICES

X. FACILITY'S EPA I.D. NO.

F I N D 0 1 1 6 3 6 0 2 6 5

XI. FACILITY ADDRESS

420 S. COLFAX AVE.
GRIFFITH, INDIANA 46319

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	TRICHLOR STILL BOTTOMS FROM VAPOR DEGREASING	0 1	F 0 0 1	2 5	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date Received

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 1 7 0 7 9 6 2 5 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MCKESSSON ENVIRONMENTAL SYSTEMS

X. FACILITY'S EPA I.D. NO.

F K Y D 0 1 5 1 3 1 4 8 1 1 0 8

XI. FACILITY ADDRESS

STATE HIGHWAY 146
P.O. BOX 146
NEW CASTLE, KY 40050

XII. TRANSPORTATION SERVICES USED

VALLEY CITY REFUSE INC. MID055855373

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	TRICHLOR STILL BOTTOMS FROM VAPOR DEGREASING	0 1	F 0 0 1	4 7	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 1 7 0 7 9 6 2 5 [redacted] TIA C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ORGANIC CHEMICALS INC.

X. FACILITY'S EPA I.D. NO.

M I D 9 9 0 8 5 8 0 0 3

XI. FACILITY ADDRESS

3291 CHICAGO DRIVE
GRANDVILLE, MICHIGAN 49418

XII. TRANSPORTATION SERVICES USED

SPARTAN CHEMICAL MID079300125

XIII. WASTE IDENTIFICATION

Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	WASTE FREON FROM VAPOR DEGREASING	0 1	F 0 0 1	1 9	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

RECLAIMED AND RETURNED IN ORIGINAL DRUMS

Do not make entries in shaded areas

OMB o. 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T A C

N Y D 0 0 0 8 1 3 4 3 6 1 1

1 2 13 14 15

III. NAME OF INSTALLATION

G M C . R O C H E S T E R . P R O D U C T S D I V . - L I F E

30 64

IV. INSTALLATION MAILING ADDRESS

P O B O X 1 7 9 0

15 16 45

Street or P.O. Box

R O C H E S T E R N Y 1 4 6 9 2

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5 0 0 L E E R O A D

15 16 45

Street or Route number

R O C H E S T E R N Y 1 4 6 0 6

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

C I R I E L L O F R A N K J

15 16 45

Name (last and first)

7 1 6 - 5 4 6 - 9 7 8 7

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify, under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

FRANK J. CIRIELLO SUPT., ENVIRONMENTAL ENGINEERING Frank J Ciriello 2/28/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C NYD000813436 T/A C 1

IX. FACILITY NAME (Identify facility to which all wastes on this page were shipped)

GMC ROCHESTER PRODUCTS - LEXINGTON

X. FACILITY'S EPA I.D. NO.

F NYD002215234

XI. FACILITY ADDRESS

1000 LEXINGTON AVENUE
ROCHESTER, NY 14603

XII. TRANSPORTATION SERVICES USED

GMC Rochester Products Division - NYD002215234 & NYD000813436

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Spent Halogenated Solvent	1 3	F 0 0 1	1 3 6 2	G
	2	Waste Water Treatment Sludge from Electroplating Operation	1 5	F 0 0 8	1 6	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Line 1 -
Density of Spent Halogenated Solvent 9.8 lb/gal

Tear out here

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 6 of 6

(2) ☐ GENERATOR EPA ID NUMBER [redacted] OR ☒ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME G.M.C. Rochester Products Division-Lee Operation
STREET 500 Lee Road
CITY Rochester STATE N.Y. ZIP CODE 14606

(3) ☐ TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] – [ ]

NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [ ]

NAME G.M.C. Rochester Products Division-Lexington Operation
STREET 1000 Lexington Ave.
CITY Rochester STATE N.Y. ZIP CODE 14603

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Spent Halogentated Solvent Used In Degreasing	F 0 0 1	0 1	T 6 3	1 3 6 2	0 1	0 2
Waste Water Treatment Sludge From Electroplating Operation	F 0 0 6	0 2	S 0 1	1 6	0 4	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME Frank J. Ciriello TITLE Superintendent, Envir. Eng.
SIGNATURE Frank J Ciriello DATE 2/20/84

47-15-16 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 1

(2) ☐ GENERATOR EPA ID NUMBER [redacted] OR ☐ SMALL GENERATOR

NAME

STREET

CITY STATE ZIP CODE

(3) ☒ TRANSPORTER EPA ID NUMBER NYD 0 0 2 1 5 2 3 8 NYSDEC Part 364 Permit No. 8A - 0 7 2

NAME G.M.C. Rochester Products Division

STREET P.O. Box 1790

CITY Rochester STATE N.Y. ZIP CODE 14692

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER NYD 0 0 2 1 5 2 3 8 NYSDEC Facility I.D. No.

NAME G.M.C. Rochester Products Division

STREET 1000 Lexington Ave.

CITY Rochester W. 03

RPD

Lexington - Lee Transporter

(5) WASTE DESCRIPTION	(10) UNITS	(11) ON-OFF SITE
Waste Water Treatment Sludge From Electroplating Operation	1 6 0 4	
Solids/Sludges Containing Oil	4 1 0 4	
Spent Halogenated Solvent Used In Degreasing	6 2 0 1	
Mineral Oil From Industrial Sources	4 0 0 1	

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME Frank J. Ciriello TITLE Superintendent, Environmental Engineering

SIGNATURE Frank J. Ciriello DATE 2/28/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 6

(2) ☒ GENERATOR EPA ID NUMBER [redacted] OR ☒ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME GMC Rochester Products Division - Lexington Operation

STREET 1000 Lexington Avenue

CITY Rochester STATE NY ZIP CODE 14603

(3) ☐ TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER N Y D 0 4 8 3 6 6 7 9 NYSDEC Facility I.D. No.

NAME SCA Chemical Services, Inc.

STREET Balmer Road

CITY Model City STATE NY ZIP CODE 14107

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Cyanide - Contaminated Equipment	0 1 0 | 0 1 3	0 1 2	0 1 8 | 1	2 7	0 1 4	0 1 2
Spent Halogenated Solvent	F 1 0 | 0 1 1	0 1 1	S 1 0 | 1	2 1 5 0	0 1 3	0 1 2
Waste Water Treatment Sludge from Electroplating Operation	F 1 0 | 0 1 6	0 1 2	0 1 8 | 1	3 1 1 7	0 1 4	0 1 2
PCB Capacitors	R 1 0 | 0 1 7	0 1 2	S 1 0 | 1	1 9 0	0 1 3	0 1 2
Corrosive Waste, Solid	0 1 0 | 0 1 2	0 1 2	0 1 8 | 1	2 0 6 9 0	0 1 3	0 1 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME Frank J. Ciriello TITLE Superintendent, Environmental Engineering

SIGNATURE Frank J. Ciriello DATE 2/28/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 6

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME GMC Rochester Products Division - Lexington Operation
STREET 1000 Lexington Avenue
CITY Rochester STATE NY ZIP CODE 14603

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] - [ ]
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [ ]
NAME Frontier Chemical Waste Process
STREET 4626 Royal Avenue
CITY Niagara Falls STATE NY ZIP CODE 14303

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Petroleum Distillate	D010 011	011	T150	56710	011	012
Waste Cyanide	F010 111	012	T127	6715	013	012
Spent Halogenated Solvent used in Degreasing Operation	F010 011	011	T150	3310	011	012

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(13) PRINT OR TYPE NAME Frank J. Ciriello TITLE Superintendent, Environmental Engineering
SIGNATURE Frank J. Ciriello DATE 2/28/84

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 — Page No. 1 of 6

(2) ☒ GENERATOR EPA ID NUMBER [redacted] OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME GMC Rochester Products Division-Lexington Operation
STREET 1000 Lexington Ave.
CITY Rochester | STATE N.Y. | ZIP CODE 14603

(3) ☐ TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] - [ ]

NAME
STREET
CITY | STATE | ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [ ]

NAME Frontenac Environmental Services
STREET 3163 Buffalo Ave.
CITY Niagara Falls | STATE N.Y. | ZIP CODE 14303

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Petroleum Distillate	D001	01	S14	7830	01	02

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME Frank J. Ciriello | TITLE Superintendent, Env. Eng.
SIGNATURE Frank J Ciriello | DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 4 of 6

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME CMC ROCHESTER PRODUCTS DIVISION - LEXINGTON OPERATION

STREET 1000 Lexington Avenue

CITY Rochester STATE N.Y. ZIP CODE 14603

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] - [ ]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [ ]

NAME CECOS International

STREET 56th And Pine St.

CITY Niagara Falls STATE N.Y. ZIP CODE 14302

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Water Treatment Sludge From Electro Plating Operation	F 0 1 0	6 0 2	D 8 1	5 9 0 4	0 2	

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME Frank J. Ciriello TITLE Superintendent, Envir. Eng.

SIGNATURE Frank J. Ciriello DATE 2/28/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 5 of 6

(2) ☒ GENERATOR EPA ID NUMBER [redacted] OR ☒ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME G.M.C. ROCHESTER PRODUCTS DIVISION - LEXINGTON OPERATIONS

STREET 1000 Lexington Avenue

CITY Rochester STATE N.Y. ZIP CODE 14603

(3) ☐ TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [redacted]

NAME Voelker Analysis

STREET 766 Babcock St.

CITY Buffalo STATE N.Y. ZIP CODE 14206

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Spent Halogenated Solvent Used In Degreasing Operation	F 0 0 8	0 1	T 5 4	2 3 0	0 1	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME Frank J. Ciriello TITLE Superintendent, Envir. Eng.

SIGNATURE Frank J. Ciriello DATE 2/28/84

Do not make entries in shaded areas

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

TAC

(1-2) NYD002215234 (13-14-15) 1

III. NAME OF INSTALLATION

(30-69) GMC ROCHESTER PRODUCTS DIV - LEXINGTON

IV. INSTALLATION MAILING ADDRESS

(15-16) P.O. BOX 1790 (45)
Street or P.O. Box

(15-16) ROCHESTER (41-42) NY (47-51) 14692
City or Town — State — Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(15-16) 5100 LEXINGTON AVE (45)
Street or Route number

(15-16) ROCHESTER (41-42) NY (47-51) 14603
City or Town — State — Zip Code

VI. INSTALLATION CONTACT

(15-16) CIRIELLO FRANK J (45)
Name (last and first)

(46-55) 716-546-9787
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

FRANK J. CIRIELLO	SUPT., ENVIRONMENTAL ENGINEERING	Frank Ciriello	4/28/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C N Y D 0 0 2 2 1 5 2 3 4 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SCA CHEMICAL SERVICES, INC.

X. FACILITY'S EPA I.D. NO.

F N Y D 0 4 9 8 3 6 6 7 9

XI. FACILITY ADDRESS

BALMER ROAD
MODEL CITY, NY 14107

XII. TRANSPORTATION SERVICES USED

Tonawanda Tank Transport - NYD097644801
SCA Chemical Services - NYD049836679
Lewiston Trucking - NYD980648228
Modern Disposal - NYD051817682

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure	
	1	Cyanide Contaminated Equipment	15	D003	27	T	✓
	2	Spent Halongenated Solvent	15	F001	2150	P	✓
	3	Waste Water Treatment Sludge from Electroplating Operation	15	F006	311	T	✓
	4	Corrosive Waste, Solid	02	D002	20490	P	✓
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

N Y D 0 0 2 2 1 5 2 3 4 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

FRONTIER CHEMICAL WASTE PROCESS

X. FACILITY'S EPA I.D. NO.

N Y D 0 4 3 8 1 5 7 0 3

XI. FACILITY ADDRESS

4626 ROYAL AVENUE
NIAGARA FALLS, NY 14303

XII. TRANSPORTATION SERVICES USED

FRONTIER CHEMICAL WASTE PROCESS - NYD043815703

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure	
	1	WASTE PETROLEUM DISTILLATE	0 8	D 0 0 1	5 6 7 0	G	✓
	2	WASTE CYANIDE MIXTURE, DRY	1 8	F 0 1 1	6 7 5	P	✓
	3	SPENT HALOGENATED SOLVENT	0 1	F 0 0 1	3 3 0	G	✓
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

Line 1 -
Density of Waste Petroleum Distillate 6.7 lb/gal
Line 3 -
Density of Spent Halogenated Solvent 9.8 lb/gal

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C
N Y D 0 0 2 2 1 5 2 3 4 1 1
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

FRONTENAC ENVIRONMENTAL SERVICES

X. FACILITY'S EPA I.D. NO.

F N Y D 0 0 0 0 8 2 4 4 6
16 28

XI. FACILITY ADDRESS

3163 BUFFALO AVENUE
NIAGARA FALLS, NY 14303

XII. TRANSPORTATION SERVICES USED

FRONTENAC ENVIRONMENTAL SERVICES _ NYD000082446

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	WASTE PETROLEUM DISTILLATE	0 8 (33 34)	D 0 0 1 (35 38 39 42 / 43 46 47 50)	7 8 3 0 (51 59)	G (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Line 1 -
Density of Waste Petroleum Distillate 6.7 lb/gal

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 2 2 1 5 2 3 4 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CECOS INTERNATIONAL

X. FACILITY'S EPA I.D. NO.

F N Y D 0 8 0 3 3 6 2 4 1

XI. FACILITY ADDRESS

56th and PINE STREET
NIAGARA FALLS, NY 14302

XII. TRANSPORTATION SERVICES USED

NIAGARA SANITATION - NYD080340094
TONAWANDA TANK TRANSPORT - NYD097644801

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29-32	1	Waste Water Treatment Sludge from Electroplating Operation	15	F006	59	T
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

N Y D 0 0 2 2 1 5 2 3 4 (T/A C) 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

VOELKER ANALYSIS

X. FACILITY'S EPA I.D. NO.

N Y D 9 9 1 2 9 1 7 8 3

XI. FACILITY ADDRESS

766 BABCOCK STREET

BUFFALO, NY 14206

XII. TRANSPORTATION SERVICES USED

Eugene Krause & Ball - NYD002111771

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	SPENT HALOGENATED SOLVENT	1 3	F 0 0 1	2 3 0	G
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Line 1 -
Density of Spent Halogenated Solvent 9.8 lb/gal

Page 6 of 6

Tear out here

Please print or type with ELITE type (12 characters per inch)

GSA No. 12345-XX
Form Approved OMB No. 158-R00XX

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE REPORT

PLEASE PLACE LABEL IN THIS SPACE

I. TYPE OF HAZARDOUS WASTE REPORT

PART A GENERATOR ANNUAL REPORT
THIS REPORT IS FOR THE YEAR ENDING DEC. 31: 1983

PART B: FACILITY ANNUAL REPORT
THIS REPORT FOR YEAR ENDING DEC. 31: 19

PART C: UNMANIFESTED WASTE REPORT
THIS REPORT IS FOR A WASTE RECEIVED (day, mo., & yr.): - - 19

INSTRUCTIONS: You may have received a preprinted label attached to the front of this pamphlet; affix it in the designated space above—left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing this form. The information requested herein is required by law (Section 3002/3004 of the Resource Conservation and Recovery Act).

II. INSTALLATION'S EPA I.D. NUMBER
F: VAD091222588

III. NAME OF INSTALLATION
GMC DELCO MORAINE DIVISION

IV. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX
3: 3401 TIDEWATER TRAIL
CITY OR TOWN | ST | ZIP CODE
4: FREDERICKSBURG | VA | 22401

V. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER
6: 3401 TIDEWATER TRAIL
CITY OR TOWN | ST | ZIP CODE
6: FREDERICKSBURG | VA | 22401

VI. INSTALLATION CONTACT
NAME (last and first) | PHONE NO. (area code & no.)
2: DICKERSON STEVE | 703-899-5060

VII. TRANSPORTATION SERVICES USED (for Part A reports only)
List the EPA Identification Numbers for those transporters whose services were used during the reporting year represented by this report.

ASSOC. CHEM. & ENV. SERVICES	OHD 045247905
S.B. MORABITE INTERSTATE	OHD 004535357
SHENANDOAH ENV. SERVICES	VAD 980537542

VIII. COST ESTIMATES FOR FACILITIES (for Part B reports only)

A. COST ESTIMATE FOR FACILITY CLOSURE	B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE (disposal facilities only)
9: $	$

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. PRINT OR TYPE NAME	B. SIGNATURE	C. DATE SIGNED
R. L. STUMP GENERAL MFG. MANAGER		9-22-84

EPA Form 8700-12 (5-80)

Please print or type with ELITE type (12 characters/inch).

EPA No. 12345-XX
Form Approved OMB No. 158-R03XX

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA GENERATOR ANNUAL REPORT – PART A

(Collected under the authority of Section 3002 of RCRA)

FOR OFFICIAL USE ONLY (Items I and II)

I. DATE RECEIVED: [ ][ ]-[ ][ ]-19[ ]

II. TYPE OF REPORT:

II. GENERATOR'S EPA I.D. NO.: G V A D 0 9 1 2 2 2 5 8 8 (CHECK 1)

XI. FACILITY'S EPA I.D. NO.: O H D 0 4 5 2 4 3 7 0 6

XIII. FACILITY ADDRESS (street or P.O. box, city, town, & zip code):
876 OTTER CREEK ROAD
OREGON, OHIO 43616

XII. FACILITY NAME (specify):
FONDESSY ENTERPRISES, INC.

XIV. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. EPA HAZARDOUS WASTE NUMBER (ENTER MULTIPLE)	D. AMOUNT OF WASTE	UNIT OF MEASURE (ENTER CODE)
1	SLUDGE FROM SALT BATH HEAT TREAT OPERATIONS	13	D001	145	T
2	WASTEWATER TREATMENT SLUDGES FROM ELECTROPLATING OPERATIONS	12	F006	282	T
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XV. COMMENTS (enter information by Line Number or any additional items):

1) HEAT TREAT SYSTEM DOES NOT USE CYANIDE SALTS.

EPA Form 8700-12A (6-80)

WILLAMETTE CORE MARK-SENSE

Please print or type with ELITE type (12 characters per inch)

GSA No. 12345 XX
Form Approved OMB No. 158-R00XX

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE REPORT

PLEASE PLACE LABEL IN THIS SPACE

I. TYPE OF HAZARDOUS WASTE REPORT

PART A. GENERATOR ANNUAL REPORT
THIS REPORT IS FOR THE YEAR ENDING DEC. 31: 1 0

PART B. FACILITY ANNUAL REPORT
THIS REPORT FOR YEAR ENDING DEC. 31: 1 0 8 3

PART C. UNMANIFESTED WASTE REPORT
THIS REPORT IS FOR A WASTE RECEIVED (day, mo., & yr.): ___ - ___ - 1 0

INSTRUCTIONS. You may have received a preprinted label attached to the front of this pamphlet, affix it in the designated space above—left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Sections II, III, and IV below blank. If you did not receive a preprinted label, complete all sections. "Installation" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing the form. The information requested herein is required by law (Section 3002.0004 of the Resource Conservation and Recovery Act)

II. INSTALLATION'S EPA I.D. NUMBER

6 VAD091222588 | 1

III. NAME OF INSTALLATION

GMC DELCO MORAINE DIVISION

IV. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX
3 3401 TIDEWATER TRAIL

CITY OR TOWN | ST | ZIP CODE
4 FREDERICKSBURG | VA | 22401

V. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER
5 3401 TIDEWATER TRAIL

CITY OR TOWN | ST | ZIP CODE
6 FREDERICKSBURG | VA | 22401

VI. INSTALLATION CONTACT

NAME (last and first) | PHONE NO. (area code & no.)
2 DICKERSON STEVE | 703-899-5060

VII. TRANSPORTATION SERVICES USED (for Part A reports only)

List the EPA Identification Numbers for those transporters whose services were used during the reporting year represented by this report.

VIII. COST ESTIMATES FOR FACILITIES (for Part B reports only)

A. COST ESTIMATE FOR FACILITY CLOSURE	B. COST ESTIMATE FOR POST CLOSURE MONITORING AND MAINTENANCE (disposal facilities only)
1 G $ 25,650	$

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. L. STUMP
A. PRINT OR TYPE NAME
GENERAL MFG. MANAGER
B. SIGNATURE
3-2-84
C. DATE SIGNED

EPA Form 8700-13 (6-80)

Please print or type with ELITE type (12 characters/inch).

GSA No. 12345-XX
Form Approved OMB No. 158-R85XX

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

FACILITY REPORT – PARTS B & C

(Submitted under the authority of Section 3005 of RCRA.)

FOR OFFICIAL USE ONLY (Items I & II)

I. DATE RECEIVED

II. RECEIVED BY

XVI. TYPE OF REPORT (enter an "X")

☒ PART B ☐ PART C

XVII. FACILITY'S EPA I.D. NO.

CVAD091222588

XVIII. GENERATOR'S EPA I.D. NO.

XIX. GENERATOR ADDRESS (street or P.O. box, city, state, & zip code)

XIX. GENERATOR NAME (specify)

ON-SITE

XXI. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. EPA HAZARDOUS WASTE NUMBER (see instructions)	C. HANDLING METHOD (enter code)	D. AMOUNT OF WASTE	UNIT OF MEASURE (enter code)
1	SLUDGE FROM SALT BATH HEAT TREAT OPERATIONS	D001	S01	10800	P
2	WASTEWATER TREATMENT SLUDGE FROM ELECTROPLATING OPERATIONS ...	F006	S01	14	T
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XXII. COMMENTS (enter information by line number – see instructions)

EPA Form 8700-13B 12-88

BILLING CODE 6560-01-C

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

(F|O|H|D|0|4|5|5|5|7|7|6|6| |1|)
1 2 13 14 15

II. NAME OF INSTALLATION

(G|M|C| |D|E|L|C|O| |M|O|R|A|I|N|E| |D|I|V| |D|A|Y|T|O|N| |N|O|R|T|H| | | |)
30 67

III. INSTALLATION MAILING ADDRESS

(3|1|4|2|0| |W| I|S|C|O|N|S|I|N| |B|O|U|L|E|V|A|R|D| | | | | |)
15 16 45

Street or P.O. Box

(D|A|Y|T|O|N| | | | | | | | | | | | | | | | |O|H|4|5|4|0|1|)
15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

(3|1|1|0|0| |N|E|E|D|M|O|R|E| |R|O|A|D| | | | | | | | | | | | | | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

C O H D 0 4 5 5 5 7 7 6 6 TAC 12

IX. FACILITY'S EPA I.D. NO.

A L T 0 0 0 6 2 2 4 6 4

X. FACILITY NAME

C H E M I C A L W A S T E M A N A G E M E N T

XI. FACILITY'S ADDRESS

P O B O X 5 5

Street or P.O. Box

E M E L L E A L 3 5 4 5 9

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTE NITRATE MIXTURE, IGNITABLE	1 3	D 0 0 1	2 7 0 5 0	P
2	SLUDGE FROM ELECTROPLATING OPERATIONS, EP TOXIC	1 2	D 0 0 7 D 0 0 8	1 1 9 6 0	P
3	WASTE FORMALDEHYDE	1 2	U 1 2 2	5 0 0	P
4	WASTE FURFURAL	0 1	U 1 2 5	4 0 5 0	P
5	WASTE INK, IGNITABLE, EP TOXIC	0 1	D 0 0 1 D 0 0 8	5 0 0	P
6	WASTE PAINT, IGNITABLE	0 7	D 0 0 1	6 4 4 0	P
7	WASTE POTASSIUM PERMANGANATE, IGNITABLE	1 3	D 0 0 1	5 5 0	P
8	WASTE ALCOHOL, IGNITABLE	0 7	D 0 0 1	2 8 6 0	P
9	WASTE SOLVENT, IGNITABLE	0 7	D 0 0 1	3 3 0 3 0	P
10	WASTE GLUE, IGNITABLE	0 8	D 0 0 1	3 4 6 5 0	P
11	WASTE BIOCIDE, IGNITABLE	0 7	D 0 0 1	4 4 0	P
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

OHD045557766 121

IX. FACILITY'S EPA I.D. NO.

OHD045557766

X. FACILITY NAME

CEGOS/CER

XI. FACILITY'S ADDRESS

5092 ABER ROAD

Street or P.O. Box

WILLIAMSBURG OH 45176

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	SCRAP EQUIPMENT, EP TOXIC	12	D007	2010	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

EQUIPMENT CONTAMINATED WITH CHROME RESIDUE.

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

OHD045557766 12

IX. FACILITY'S EPA I.D. NO.

OHD045557766

X. FACILITY NAME

FONDESSY ENTERPRISES INC

XI. FACILITY'S ADDRESS

8760 OTTER CREEK ROAD

Street or P.O. Box

OREGON OH 43616

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTE TREATMENT SLUDGE FROM ELECTROPLATING OPERATIONS	1 2	F 0 0 6	5 8 0 2 0 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Page 4 of 4

42-590 O—85——61

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

F O H D 0 6 0 9 2 8 5 6 1

1 2 13 14 15

II. NAME OF INSTALLATION

G M C DIESEL DIV MORAINE NEW DIV DAYTON SOUTH

20 40

III. INSTALLATION MAILING ADDRESS

3 1 4 2 0 WILSON BLVD

15 16 45

Street or P.O. Box

4 DAYTON OH 4 5 4 0 1

15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

5 1 4 2 0 WILSON BLVD 5 7

15 16 45 47 48

County Code

6 DAYTON OH 4 5 4 0 1 3 7 1 4

15 16 41 42 47 51 53 56

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

7 DARST JACK 5 1 3 - 2 2 7 - 6 4 0 2

15 16 45 46 55

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED

List the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year.

INDIANA LIQUID TRANSPORT IND058484114 A.C.E.S. OHD045247905
CHEMICAL WASTE MANAGEMENT OHD000724161
CECOS/CER OHD087433744
FONDESSY ENTERPRISES, INC. OHD045243706

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. L. STUMP GENERAL MFG. MANAGER 2-21-84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA 8019

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C O H D 0 6 0 9 2 8 5 6 1 2

IX. FACILITY'S EPA I.D. NO.

O H D 0 4 5 2 4 3 7 0 6

X. FACILITY NAME

F O N D E S S Y E N T E R P R I S E S I N C

XI. FACILITY'S ADDRESS

8 7 6 O T T E R C R E E K R O A D

Street or P.O. Box

O R E G O N O H 4 3 6 1 6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTEWATER TREATMENT SLUDGES FROM ELECTROPLATING OPERATIONS...	1 2	F 0 0 6	2 2 0	T ✓
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

OHD016091256 12

IX. FACILITY'S EPA I.D. NO.

IND093219042

X. FACILITY NAME

ILWD INC

XI. FACILITY'S ADDRESS

7901 MORRIS STREET

Street or P.O. Box

INDIANAPOLIS IN 46231

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTEWATER TREATMENT SLUDGES FROM ELECTROPLATING OPERATIONS...	1 2	F 0 1 0 1 6	6 5 3	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C O H D 0 6 0 9 2 8 5 6 1 12

IX. FACILITY'S EPA I.D. NO.

A L T 0 0 0 6 2 2 4 6 4

X. FACILITY NAME

CHEMICAL WASTE MANAGEMENT INC

XI. FACILITY'S ADDRESS

P O B O X 5 5

Street or P.O. Box

ELYRIA AL 3 5 4 5 9

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
	WASTE FLUOBORIC ACID, LEAD FLUOBORATE				
1	MIX, (1) CORROSIVE, EP TOXIC (2) FLUOBORIC AND HF ACIDS	0 2	D 0 0 8	2 1	T
2	WASTE ALCOHOL MIXTURE, N.O.S. (1) IGNITABLE (2) DIACETONE ALCOHOL	0 1	D 0 0 1	2 2 7 2 0	P
3	WASTE SOLVENT, N.O.S. (1) IGNITABLE (2) SYNASOL	0 7	D 0 0 1	2 2 7 2	P
4	WASTE ISOPROPANOL (1) IGNITABLE (2) ISOPROPANOL	0 7	D 0 0 1	3 7 4	P
5	WASTE NAPHTHA, SOLVENT (1) IGNITABLE (2) NAPHTHA	0 7	D 0 0 1	3 7 4	P
6	WASTE FLAMMABLE LIQUID, N.O.S. (1) IGNITABLE (2) DIESEL FUEL	0 7	D 0 0 1	2 4 7 5	P
7	WASTE COMBUSTIBLE LIQUID, N.O.S. (1) IGNITABLE (2) STYRENE FLUID, OIL	0 1	D 0 0 1	5 0 8 2	P
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO. T/AC

C O H D 0 6 0 9 2 8 5 6 1 2

IX. FACILITY'S EPA I.D. NO.

O H D 0 8 7 4 3 3 7 4 4

X. FACILITY NAME

C E G O S / C E R

XI. FACILITY'S ADDRESS

5 0 9 2 A B E R R O A D

Street or P.O. Box

W I L L I A M S B U R G 0 H 4 5 1 7 6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	PLATING BATH SLUDGE FROM ELECTROPLATING OPERATIONS WHERE CYANIDES ARE USED	1 5	F 0 0 8	2 0	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

DEPARTMENT OF ENVIRONMENTAL REGULATION
GENERATOR ANNUAL HAZARDOUS WASTE REPORT

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1983

GENERAL INSTRUCTIONS: PLEASE REFER TO THE SPECIFIC INSTRUCTIONS BEFORE COMPLETING THIS FORM. THE INFORMATION REQUESTED IN THIS REPORT IS REQUIRED BY RULE (CHAPTER 17-30, FLORIDA ADMINISTRATIVE CODE).

THE DATA BELOW IS WHAT THE DEPARTMENT OF ENVIRONMENTAL REGULATION HAS ON FILE. IF ANY ITEM IS INCORRECT, PLEASE FILL IN THE CORRECTED INFORMATION IN THE SPACE PROVIDED.

EPA/DER ID NUMBER:	FLD079201273
FACILITY NAME:	GENERAL MOTORS CORP/ELECTRO-MOTIVE
MAILING ADDRESS:	3545 NEW KINGS ROAD
CITY, STATE, ZIP:	JACKSONVILLE FL 33209
FACILITY LOCATION:	3545 NEW KINGS ROAD, JACKSONVILLE, FL
CONTACT PERSON:	JACK KAPS, ENVIRONMENTAL E
PHONE:	312-387-5904
LAT/LONG:	30.21.38/81.42.43

I. EPA/DER ID NUMBER ----------

II. GENERATOR NAME ----------

III. MAILING ADDRESS ----------

CITY, STATE, ZIP ---------- * --- ---------

IV. FACILITY LOCATION ----------

CITY, STATE, ZIP ----------* --- -------

V. CONTACT PERSON ----------

PHONE (---) --- - ----

VI. LATITUDE LONGITUDE --- * --- * --- / --- * --- * ---

VII. CERTIFICATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

L.F. KUELTZO — MANAGER, REBUILD MANUFACTURING
PRINT/TYPE NAME — TITLE

L.F. Kuelt — 2-1-84
SIGNATURE OF AUTHORIZED REPRESENTATIVE — DATE SIGNED

EPA-ID: FLD079201273 GMS-ID: 3116P80351

DEPARTMENT OF ENVIRONMENTAL REGULATION
GENERATOR ANNUAL HAZARDOUS WASTE REPORT

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1983

VIII. THIS SECTION MUST BE COMPLETED BY GENERATORS THAT NOTIFIED EPA OR DER OF HAZARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA OR CHAPTER 403, FS, BUT DID NOT HANDLE QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING THE REPORTING YEAR THAT ARE SUBJECT TO THE GENERATOR ANNUAL REPORTING REQUIREMENTS.

PLEASE CIRCLE THE APPROPRIATE CODE(S) AT RIGHT WHICH BEST DESCRIBES YOUR INSTALLATION STATUS FOR THE REPORTING YEAR.

CODE

A. NON-HANDLER -- DID NOT HANDLE HAZARDOUS WASTE IN ANY QUANTITY DURING THE REPORTING YEAR..... 1

B. SMALL QUANTITY GENERATOR -- DID NOT GENERATE MORE THAN 1000 KG. OF HAZARDOUS WASTE (OR 1 KG. OF ACUTELY HAZARDOUS WASTE) IN ANY SINGLE MONTH OR ACCUMULATE MORE THAN 1000 KG. OF HAZARDOUS WASTE (OR 1 KG. OF ACUTELY HAZARDOUS WASTE) ON-SITE AT ANY TIME DURING THE REPORTING YEAR IN ACCORDANCE WITH 40 CFR PART 261.5 2

C. EXEMPT - ALL WASTES GENERATED IN FARMING OPERATIONS IN ACCORDANCE WITH 40 CFR PART 262.51, OR EXEMPT PURSUANT TO 40 CFR PART 261.4 3

D. BENEFICIAL USE -- ALL HAZARDOUS WASTE GENERATED WAS BENEFICIALLY USED, REUSED, OR RECYCLED IN ACCORDANCE WITH 40 CFR PART 261.6(A)..... 4

E. CLOSED -- INSTALLATION WAS CLOSED PRIOR TO THE REPORTING YEAR 5

GENERATORS THAT MEET ONE OF THE ABOVE EXEMPTIONS ARE NOT REQUIRED TO COMPLETE SECTIONS IX - XI OF THIS ANNUAL REPORT IDENTIFYING HAZARDOUS WASTE SHIPPED OFF-SITE DURING THE REPORTING YEAR.

EPA-ID: FLD079201273 GMS-ID: 3116P80351

DEPARTMENT OF ENVIRONMENTAL REGULATION
GENERATOR ANNUAL HAZARDOUS WASTE REPORT

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1983

IX. FACILITY NAME AND LOCATION TO WHICH ALL WASTES LISTED ON THIS PAGE WERE SHIPPED. A COPY OF THIS SHEET MUST BE FILLED OUT FOR EACH FACILITY THAT RECEIVED HAZARDOUS WASTES.

FACILITY NAME CHEMICAL WASTE MGT., INC. EPA/DER ID NO ALD 000622464

FACILITY LOCATION P.O. BOX 55

CITY EMELLE STATE AL ZIP CODE 35459

X. TRANSPORTATION SERVICES USED. LIST THE NAME AND EPA/DER IDENTIFICATION NUMBER OF ALL TRANSPORTERS WHOSE SERVICES WERE USED DURING THE REPORTING YEAR. COMPLETE THIS SECTION ONLY ONCE. DO NOT REPEAT ON SUPPLEMENTAL SHEETS. (SEE INSTRUCTIONS)

TRANSPORTER NAME	TRANSPORTER EPA/DER ID NO
CHEMICAL WASTE MGT., INC.	ALD 000622464
CHEMICAL WASTE MGT., INC.	FLD 000776708

XI. WASTE IDENTIFICATION

	(A) DESCRIPTION OF WASTE	(B) DOT HAZARD CODE	(C) EPA HAZARDOUS WASTE NUMBER (SEE INSTRUCTIONS)	(D) AMOUNT OF WASTE	(E) UNIT OF MEASURE
1	CORROSIVE CAUSTIC SLUDGE GENERATED FROM WASHING VARIOUS PARTS; MIXTURE OF SODIUM HYDROXIDE, DIRT, AND OIL	02	D002 D006 D007 D008	8257	P
2	METHYLENE CHLORIDE.	13	F001 D007 D008	4587	P
3					
4					
5					
6					

COMMENTS:

EPA-ID: FLD079201273 GMS-ID: 3116980351

DEPARTMENT OF ENVIRONMENTAL REGULATION
GENERATOR ANNUAL HAZARDOUS WASTE REPORT

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1983

IX. FACILITY NAME AND LOCATION TO WHICH ALL WASTES LISTED ON THIS PAGE WERE SHIPPED. A COPY OF THIS SHEET MUST BE FILLED OUT FOR EACH FACILITY THAT RECEIVED HAZARDOUS WASTES.

FACILITY NAME OLDOVER CORPORATION EPA/DER ID NO FLD 000737312

FACILITY LOCATION P.O. BOX 297

CITY GREEN COVE SPRINGS STATE FL ZIP CODE 32043

X. TRANSPORTATION SERVICES USED. LIST THE NAME AND EPA/DER IDENTIFICATION NUMBER OF ALL TRANSPORTERS WHOSE SERVICES WERE USED DURING THE REPORTING YEAR. COMPLETE THIS SECTION ONLY ONCE. DO NOT REPEAT ON SUPPLEMENTAL SHEETS. (SEE INSTRUCTIONS)

TRANSPORTER NAME	TRANSPORTER EPA/DER ID NO
OLDOVER CORPORATION	VAD 040159436

XI. WASTE IDENTIFICATION

	(A) DESCRIPTION OF WASTE	(B) DOT HAZARD CODE	(C) EPA HAZARDOUS WASTE NUMBER (SEE INSTRUCTIONS)	(D) AMOUNT OF WASTE	(E) UNIT OF MEASURE
1	IGNITABLE MIXTURE OF WASTE OIL FROM WASTE-WATER SKIMMING AND MINERAL SPIRITS FROM DEGREASING OPERATIONS.	01	D001	21134	P
2					
3					
4					
5					
6					

COMMENTS:

DER FORM 17-1.207(4) PAGE 4 OF 4

Do not make entries in shaded areas

OMB No: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T A C

F M O D 0 4 5 7 2 9 1 5 9 1 1

1 2 13 14 15

III. NAME OF INSTALLATION

GMC ELECTRO-MOTIVE DIVISION BLDG #2

30 69

IV. INSTALLATION MAILING ADDRESS

3 9 3 0 1 W 5 5 T H S T PLANT ENGRG

15 16 45

Street or P.O. Box

4 6 A G R A N G E E L 6 0 5 2 5

15 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5 1 6 3 M c D O N N E L L B L V D B L D G 2

15 16 45

Street or Route number

6 H A Z E L W O O D M O 6 3 0 4 2

15 16 41 42 47 51

City or Town State Zip Code

VI. INSTALLATION CONTACT

R O B E R T K A P S

15 16 45

Name (last and first)

3 1 2 - 3 9 7 - 5 9 0 4

2 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

L.F. KUELTZO _____ 6-15-84

Print/Type Name Title Signature of Authorized Representative Date Signed

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.
MODO45729167 T/A C 1
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
Clayton Chemical

X. FACILITY'S EPA I.D. NO.
ILD066918327
16 28

XI. FACILITY ADDRESS
Plant #1 Mobile Ave
Sauget, IL 62201

XII. TRANSPORTATION SERVICES USED
SCHIBER TRUCKING, HARTFORD, IL

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Methylene Chloride	13	F001 35 38 39 42 / 43 46 47 50	2500 51 59	P 60
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)
Missouri DNR Gen No. 03674

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.
IND045729159 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
ILWD

X. FACILITY'S EPA I.D. NO.
IIND093219012

XI. FACILITY ADDRESS
7901 W. MORRIS ST
INDIANAPOLIS IND 46231

XII. TRANSPORTATION SERVICES USED
INDIANA LIQUID TRANSFER INC
COLUMBUS, IND

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. TSDF or Hazard. Gen.	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29-32	1	WASTEWATER & DIL MIX	01	* AND **	12500	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

MISSOURI DNR GEN # 03674

* THIS WASTE IS NOT HAZARDOUS BUT A MANIFEST (DNR) WAS USED.

** THIS WASTE WAS SHIPPED UNDER MDNR GEN. NO. 01575 SINCE THE FACILITY DID NOT ISSUE A SEPARATE MDNR GEN NO. FOR THIS FACILITY UNTIL 9/27/83. THE MDNR GEN. NO. IS #03674

Do not make entries in shaded areas

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T A C
MOT3000/07333 (1)
1 2 13 14 15

III. NAME OF INSTALLATION

GMC ELECTRO-MOTIVE DIVISION BLDG #1
30 64

IV. INSTALLATION MAILING ADDRESS

9301 W. 55TH ST PLANT ENGRG
15 16 45
Street or P.O. Box

LAGRANGE IL 60525
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5133 McDOWELL BLVD BLDG #1
15 16 45
Street or Route number

SHAZELWOOD MO 63042
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

KAPS JACK
15 16 45
Name (last and first)

312-387-5904
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

L.F. KUGLER — 6-15-84

Print/Type Name Title Signature of Authorized Representative Date Signed

Page 1 of 3

Tear out here

Do not make any entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

EMOT3000107338 (T A C 11)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Clayton Chemical Co

XI. FACILITY ADDRESS

PLANT #1, MOBILE AVE
STAUGET, IL 62201

X. FACILITY'S EPA I.D. NO.

ILD066918327

XII. TRANSPORTATION SERVICES USED

1. COMMERCIAL MOBILE INC, ST LOUIS, MO.
2. SCHIBER TRUCK CO., HARTFORD, ILL

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	MINERAL SPIRITS	08	D001	4,648	P
	2	METHYLENE CHLORIDE	13	F001	13750	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear rail here

XIV. COMMENTS (enter information by section number—see instructions)

MISSOURI DNR GEN # 01575

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.
EMOT3000107337 T/A C

X. FACILITY'S EPA I.D. NO.
FIND093219013

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
ILWD

XI. FACILITY ADDRESS
7901 W. MORRIS ST
INDIANAPOLIS IND 46231

XII. TRANSPORTATION SERVICES USED
INDIANA LIQUID TRANSFER INC, COLUMBUS IND

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. TSDF Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	CAUSTIC CLEANING SOL	02	D002 D006 D007 D008	42500	P
	2	OIL AND WATER	01	* AND **	29050	P
	3	USED OIL	01	D006	1890	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions) MISSOURI GEN. ID # 01575

* THIS WAS IS NOT HAZARDOUS BUT A MANIFEST (M&W) WAS USED.

** A QUANTITY OF THIS WAS ORIGINALLY SHIPPED UNDER GEN. ID NO. 01575 BUT WAS ACTUALLY GENERATED BY GEN. ID NO. 03674. THE GEN. ID NO. 03674 WAS ISSUED BY MDNR ON 9/27/83.

Do not make [redacted]

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983

MDD063214779
~~ELECTRO-MOTIVE DIV~~
~~4701 WASHINGTON BLVD~~
HALETHORPE MD 21227

GENERAL INSTRUCTIONS: If you received a preprinted label attached to the mailing envelope in which this form was enclosed, affix it in the space provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If the information is correct and complete, leave Sections I, II, and III Below blank. If you did not receive a preprinted label, complete all sections. REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM. The information requested in this report is required by law (Section 3002 of the Resource Conservation Recovery Act).

Please print/type with elite type (12 characters per inch)

Tear out here

I. GENERATOR'S EPA I.D. NUMBER

F | | | | | | | | | | | | | T A G | | |
1 2 11 12 13 14 15

II. NAME OF INSTALLATION

GMC ELECTRO-MOTIVE DIVISION
16 64

III. INSTALLATION MAILING ADDRESS

3 P. O. BOX 7380
15 16 45
Street or P.O. Box

4 | | | | | | | | | | | | |

Do not make entries [redacted]

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31 **1983**

Date rec'd: _____ Rec'd by: _____

VII. GENERATOR'S EPA I.D. NO.

G MDD063214779 TAC

VIII. FACILITY NAME (specify facility to which all wastes listed on this page were shipped)

CHEM-CLEAR, INC.

IX. FACILITY'S EPA I.D. NO.

F MDD980555189

X. FACILITY ADDRESS

1910 RUSSELL STREET
BALTIMORE, MD 21230

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification number of all transporters which services were used during 1983. This section to be completed only once. Do not repeat on supplemental sheets.)

A&A WASTE OIL, INC. MDD030330690

XII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
0001	1	WASTE CAUSTIC CLEANING SOLUTION	02	D002 D006 D007 D008	98600	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIII. COMMENTS (enter information by section number—see instructions)

Tear Out Here

Do not make entries [redacted]

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, **1983**

Date rec'd: _____ Rec'd by: _____

VII. GENERATOR'S EPA I.D. NO.

MDD063214779 (I.A.C.)

VIII. FACILITY NAME (specify facility to which all wastes on this page were shipped)

AMERICAN RECOVERY CO.

IX. FACILITY'S EPA I.D. NO.

MDD076923292

X. FACILITY ADDRESS

1901 BIRCH STREET
BALTIMORE, MD. 21226

XI. TRANSPORTATION SERVICES USED (list the name and EPA identification number of all transporters whose services were used during 1983. This section to be completed only once. Do not repeat on supplemental sheets.)

J & D RECYCLING MDD 980 553 630

XII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
0001	1	WASTE SOLVENT	05	D001	1089	P
0002	2	WASTE METHYLENE CHLORIDE	13	F001	7260	P
0003	3	WASTE VARNISH	01	D001	1980	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIII. COMMENTS (enter information by section number—see instructions)

Tear out here

Electro-Motive Division General Motors Corporation LaGrange Illinois 60525 (312) 387-6000

February 8, 1984

Mr. Harvey F. Collins
Chief, Environmental Health Branch
State of California
California State Dept. Health Services
714/744 P Street
Sacramento, CA 95814

Reference: Annual Report for Hazardous Waste Activities--1983
GMC-- Electro-Motive Division, Commerce, California

Dear Mr. Collins:

In fulfillment of the "Interim Status" standards issued to our facility, we are herein submitting our Annual Report. The information presented outlines our activities during 1983.

	Required Information	
a.	Facility ID Number	CAD 088396056
	Name	GMC--Electro-Motive Division
	Address	5928 South Malt Avenue Los Angeles County Commerce, California 90040
b.	Date	This report covers the 1983 calendar year.
c.	Activities	This facility does not receive any waste materials from any other generator. The only wastes on our property are those generated by our own activities.

Wastes generated in 1983:

Caustic liquids D002	134.07 tons
Methylene Chloride F001	0.83 tons
Used oils D001	3.00 tons
PCB's	0.20 tons
	138.10 tons

These wastes were either immediately hauled off our property for treatment and disposal at a properly permitted treatment, storage, or disposal facility,

or were temporarily stored in containers until proper transportation for disposal could be arranged.

d. Disposal Method

The following list indicates the final disposition of our hazardous wastes during 1983:

1. BKK, CAD067 786 749 Landfill

Caustics D002, 006, 007, 008	134.07 Tons
Oils D001	3.00 Tons

Transporters: IT Corporation
CAD 029 654 894
Asbury Oil Company
CAD 028 277 036

2. OSCO, CAD 008 302 903
Reclamation Process
Methylene Chloride F001 0.83 Tons

Transporter, IT Corporation
CAD 029 654 894

3. ENSCO, ARD069 748 192
Incineration
PCB Capacitors

Transporter: U.S. Services, Inc.
CAT 080 034 259

e. Monitoring Data

This facility is not required to maintain monitoring data. Regular inspection logs of our storage areas are kept up to date and are on file.

f. Facility Closure Estimate

During 1983 we requested and received approval of our Part A withdrawal. Thus, we are not required to prepare closure cost information this year."

If there are any questions, please contact the undersigned.

Very truly yours,

J. F. Kaps

C. D. Hinde
Plant Engineer

CERTIFICATION STATEMENT

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALITIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

L. F. KUELZO, MANAGER, REBUILD MANUFACTURING

2-9-84
DATE SIGNED

/blm

cc: Commerce RCRA File
File

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

20 GENERATOR ANNUAL HAZARDOUS WASTE REPORT 20

This report is for the calendar year ending December 31, 1983

FOR AGENCY USE ONLY

FOR AGENCY USE (1) L P H W C (5) CARD TYPE (6) 2 0 (7) TRANS CODE (8) A DATE ENTERED (9) (14)

GENERAL INSTRUCTIONS

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.
The information requested in this report is required by Federal and State law.

Please print type with elite type (12 characters per inch)

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the calendar year covered by this report. Circle the one numeric code 1 thru 5 that best describes your status during the entire year; see instructions for explanation of codes, and explain in Comment Section.

(15) 1 Non-handler
(15) 2 Small Quantity Generator
(15) 3 Exempt
(15) 4 Beneficial Use
(15) 5 Closed

This installation's Non-Regulated Status is expected to apply:

(15) 6 For 1983 only, explain in Comment Section.
(15) 7 Permanently, explain in Comment Section.
(15) 8 Other, explain in Comment Section.

II. REGULATED STATUS

See instructions for completing this and following sections.

III. GENERATOR'S USEPA I.D. NUMBER (1) I L D 0 0 6 0 0 9 6 9 0 (12)

IV. GENERATOR'S ILLINOIS I.D. NUMBER (13) 0 3 1 1 5 6 0 0 0 1 G (24)

V. NAME OF INSTALLATION

GMC ELECTRO-MOTIVE DIVISION

VI. INSTALLATION MAILING ADDRESS

9301 W. 55TH STREET DEPT. 1400

Street or P.O. Box

LAGRANGE IL 60526

City or Town State Zip Code

VII. LOCATION OF INSTALLATION (if different than section VI above)

Street or Route number

MCCOOK

City or Town State Zip Code

VIII. INSTALLATION CONTACT

BRANDUSH, JACK

Name (last and first)

(312) 387-5903

Phone No. (area code & no.)

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 2, Sections 1004 and 1021 (d)(2). Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues, a fine up to $3,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

F.J. BUCKLEY GENERAL MANUFACTURING MANAGER — Print Type Name

F.J. Buckley — Signature of Authorized Representative

2/24/84 — Date Signed

Page 001 of 006 (41) (42)

50

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

50

This report is for the calendar year ending December 31, 1981 (cont.)

FOR AGENCY USE ONLY

FOR AGENCY USE L P H W C | CARD TYPE 5 0 | TRANS CODE A | DATE ENTERED

X. GENERATOR'S USEPA I.D. NO.: ILD006009690

XI. GENERATOR'S ILLINOIS EPA I.D. NO.: 0311560001G

XII. FACILITY'S USEPA I.D. NO.: ILD980700728

XIII. FACILITY'S ILLINOIS EPA I.D. NO.: 09780201

XIV. FACILITY'S NAME / ADDRESS

Name: BEI, WINTHORPE HARBOR Phone: 312-746-5777

Street, P.O. Box: 9TH & GREEN BAY RD. City: ZION State: IL Zip: 60099

XV. WASTE IDENTIFICATION

A. LINE NO.	B. DESCRIPTION OF WASTE	C. UNIT (Annual Tons)	D. RCRA HAZARDOUS WASTE NO. (see instructions)	E. AMOUNT OF WASTE (gallons only)	F. DENSITY (lbs./gal.)
0001	WASTE WATER TREATMENT SLUDGE	18	D006 D007 D008 F006	217107	13.5 ✓
0002					
0003					
0004					
0005					
0006					
0007					
0008					
0009					
0010					

XVII. PAGE NUMBER 002

50 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 50

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1983 (cont.)

FOR AGENCY USE ONLY

FOR AGENCY USE | L | P | H | W | C | (1–5) CARD TYPE | S | O | (6–7) TRANS CODE | A | (8) DATE ENTERED | __ / __ / __ | (9–14)

X. GENERATOR'S USEPA I.D. NO. (18–29): ILD006009690

XI. GENERATOR'S ILLINOIS EPA I.D. NO. (30–40): 0311600016

XII. FACILITY'S USEPA I.D. NO. (41–52): ILD010284248

XIII. FACILITY'S ILLINOIS EPA I.D. NO. (53–60): 0310290 1

XIV. FACILITY'S NAME / ADDRESS

Name: CID/CHICAGO Phone: 312 891 1500

Street P.O. Box: P.O. BOX 1296 City: CALUMET CITY State: IL Zip: 60409

XV. WASTE IDENTIFICATION

A. LINE NO. (61–64)	B. DESCRIPTION OF WASTE	C. UNIT OF MEASURE (Pounds / Gallons) (65–66)	D. RCRA HAZARDOUS WASTE NO. (see instructions) (67–82)	E. AMOUNT OF WASTE (gallons only) (83–91)	F. DENSITY (lbs. / gal.) (92–94)
0001	WASTEWATER TREATMENT SLUDGE	G	D006 D007 D008 F006	65637	13.5 ✓

XVII. PAGE NUMBER (73–77): 003

50

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

50

This report is for the calendar year ending December 31, 1983 (CONT.)

FOR AGENCY USE ONLY

FOR AGENCY USE L P H W C (1–5) CARD TYPE 5 0 (6–7) TRANS CODE A (8) DATE ENTERED (9–14)

X. GENERATOR'S USEPA I.D. NO. (18–29): ILD006009690

XI. GENERATOR'S ILLINOIS EPA I.D. NO. (31–40): 0311560001G

XII. FACILITY'S USEPA I.D. NO. (41–52): ILD087157251

XIII. FACILITY'S ILLINOIS EPA I.D. NO. (53–61): 06302003

XIV. FACILITY'S NAME / ADDRESS

Name: EWR, INC. Phone: 815 634 2211

Street: P.O. Box 160 City: COAL CITY State: IL Zip: 60416

XV. WASTE IDENTIFICATION

A. LINE NO. (61–64)	B. DESCRIPTION OF WASTE	C. UNIT of Measure (65–66)	D. RCRA HAZARDOUS WASTE NO. (see instructions) (67–82)	E. AMOUNT OF WASTE (gallons only) (83–91)	F. DENSITY (lbs / gal) (92–94)
0001	SOLVENT & PAINT WASTE	08	D001	12800	8.0

XVII. PAGE NUMBER (95–97): 004

50

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

50

This report is for the calendar year ending December 31 1983 (CONT.)

FOR AGENCY USE ONLY

FOR AGENCY USE (L,P,H,W,C) CARD TYPE (5,0) TRANS CODE (A) DATE ENTERED (/ /)

X. GENERATOR'S USEPA I.D. NO.: ILD006009690

XI. GENERATOR'S ILLINOIS EPA I.D. NO.: 0311560001G

XII. FACILITY'S USEPA I.D. NO.: ILD000672121

XIII. FACILITY'S ILLINOIS EPA I.D. NO.: 0316005B

XIV. FACILITY'S NAME / ADDRESS

Name: SCA CHEMICAL SERVICES Phone: 312 646 5700

Street P.O. Box: 11700 S. STONY ISLAND City: CHICAGO State: IL Zip: 60617

XV. WASTE IDENTIFICATION

A. LINE NO	B. DESCRIPTION OF WASTE	C. UNIT OF MEASURE	D. RCRA HAZARDOUS WASTE NO. (see instructions)	E. AMOUNT OF WASTE (gallons only	F. DENSITY (lbs / gal.)
0001	OIL & GREASE	01	D001	2064	10.0
0002	PRIMER	01	D001	224	7.5
0003	VARNISH	01	D001	1552	9.0

XVII. PAGE NUMBER: 003

60

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

60

This report is for calendar year ending December 31, 1983 (cont.)

FOR AGENCY USE ONLY

FOR AGENCY USE [L|P|H|W|C] CARD TYPE [6|0] TRANS CODE [A] DATE ENTERED [/ /]

X. GENERATOR'S USEPA I.D. NO.: ILD006009690

XI. GENERATOR'S ILLINOIS EPA I.D. NO.: 0311560001G

V.-VI. GENERATOR'S NAME, ADDRESS

Name: GMC ELECTRO-MOTIVE DIVISION Phone: 312-387-6000

Street (P.O. Box): 9301 W. 55TH STREET City: MELROSE PARK State: IL Zip: 60525

XVIII. LIST OF TRANSPORTATION SERVICES (HAULERS) USED:

A. LINE NO.	B. TRANSPORTER'S NAME / ADDRESS	C. TRANSPORTER'S USEPA I.D. NO.	D. TRANSPORTER'S ILLINOIS EPA I.D. NO.
0001	BFI 5050 W. LAKE STREET MELROSE PARK, IL. 60153	ILD097177505	0107
0002	CHEMICAL WASTE MANAGEMENT 4300 W. 123RD ST. ALSIP, IL. 60658	ILD000806604	0075
0003	CHEMICAL SERVICES CORPORATION 4601 W. 138TH ST. CRESTWOOD, IL. 60445	ILD980701106	1801

XVII. PAGE NUMBER: 006

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

20 GENERATOR ANNUAL HAZARDOUS WASTE REPORT 20

This report is for the calendar year ending December 31, 1983

FOR AGENCY USE ONLY

FOR AGENCY USE [L|P|H|W|C] CARD TYPE [2|0] TRANS CODE [A] DATE ENTERED [ ]/[ ]/[ ]

GENERAL INSTRUCTIONS

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.
The information requested in this report is required by Federal and State law.

Please print/type with elite type (12 characters per inch)

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the calendar year covered by this report. Circle the one numeric code (1 thru 5) that best describes your status during the entire year. See instructions for explanation of codes, and explain in Comment Section.

[1] Non-handler
[2] Small Quantity Generator
[3] Exempt
[4] Beneficial Use
[5] Closed

This installation's Non-Regulated Status is expected to apply:

[6] For 1983 only, explain in Comment Section.
[7] Permanently, explain in Comment Section.
[8] Other, explain in Comment Section.

II. REGULATED STATUS

See instructions for completing this and following sections.

III. GENERATOR'S USEPA I.D. NUMBER: ILD005154943

IV. GENERATOR'S ILLINOIS I.D. NUMBER: 0316000406

V. NAME OF INSTALLATION

GMC ELECTRO-MOTIVE DIVISION

VI. INSTALLATION MAILING ADDRESS

900 E. 103RD STREET

Street or P.O. Box

CHICAGO IL 60617

City or Town — State — Zip Code

VII. LOCATION OF INSTALLATION (if different than section VI above)

Street or Route number

City or Town — State — Zip Code

VIII. INSTALLATION CONTACT

BRANDUCH, JACK

Name (last and first)

(312) 887-5903

Phone No. (area code & no.)

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 2, Sections 1004 and 1021 (b)2. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues, a fine up to $1,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

M.J. SCHUMAL PLANT SUPERINTENDENT — Signature of Authorized Representative — 2-17-84 Date Signed

Page 001 of 004

50

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

50

This report is for the calendar year ending December 31, 1981 (cont.)

FOR AGENCY USE ONLY

FOR AGENCY USE | L | P | H | W | C | CARD TYPE | 5 | 0 | TRANS CODE | A | DATE ENTERED | / / |

X. GENERATOR'S USEPA I.D. NO.: ILD005154943

XI. GENERATOR'S ILLINOIS EPA I.D. NO.: 0316000406

XII. FACILITY'S USEPA I.D. NO.: ILD087157251

XIII. FACILITY'S ILLINOIS EPA I.D. NO.: 0630200 3

XIV. FACILITY'S NAME / ADDRESS

Name: EWR, INC. Phone: 815 634-2211

XV. WASTE IDENTIFICATION

Street (P.O. Box): P.O. BOX 160 City: COAL CITY State: IL Zip: 60416

A. LINE NO.	B. DESCRIPTION OF WASTE	C. UNITS (enter code)	D. RCRA HAZARDOUS WASTE NO. (see instructions)	E. AMOUNT OF WASTE (gallons only)	F. DENSITY (lbs./gal.)
001	SOLVENT & PAINT WASTE	02	D001	2000	8.0 ✓
002					
003					
004					
005					
006					
007					
008					
009					
010					

XVII. PAGE NUMBER 002

50

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

50

This report is for the calendar year ending December 31, 1983 (cont.)

FOR AGENCY USE ONLY

FOR AGENCY USE | L | P | H | W | C | CARD TYPE | 5 | 0 | TRANS CODE | A | DATE ENTERED | / / |

X. GENERATOR'S USEPA I.D. NO.: ILD005154943

XI. GENERATOR'S ILLINOIS EPA I.D. NO.: 0316000406

XII. FACILITY'S USEPA I.D. NO.: ILD010284248

XIII. FACILITY'S ILLINOIS EPA I.D. NO.: 0316005G

XIV. FACILITY'S NAME / ADDRESS

Name: CID CHICAGO Phone: 312 891 1500

Street (P.O. Box): P.O. BOX 1306 City: CALUMET CITY State: IL Zip: 60409

XV. WASTE IDENTIFICATION

A. LINE NO.	B. DESCRIPTION OF WASTE	C. UNITS (Pounds / Gallons)	D. RCRA HAZARDOUS WASTE NO. (see instructions)	E. AMOUNT OF WASTE (gallons only)	F. DENSITY (lbs. / gal.)
0001	WASTEWATER AND OIL	15	D006 D007 D008	20000	8.5

XVII. PAGE NUMBER: 003

60 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
GENERATOR ANNUAL HAZARDOUS WASTE REPORT 60

This report is for calendar year ending December 31, 1983 (cont.)

FOR AGENCY USE ONLY

FOR AGENCY USE (L|P|H|W|C) CARD TYPE (6|0) TRANS CODE (A) DATE ENTERED

X. GENERATOR'S USEPA I.D. NO. XI. GENERATOR'S ILLINOIS EPA I.D. NO.

ILD005154943 0316000040G

V./VI. GENERATOR'S NAME/ADDRESS

Name GMC ELECTRO-MOTIVE DIVISION Phone 312.995.4400

900 E. 103RD STREET (Street P.O. Box) CHICAGO (City) IL (State) 60617 (Zip)

XVIII. LIST OF TRANSPORTATION SERVICES (HAULERS) USED:

A. LINE NO.	B. TRANSPORTER'S NAME / ADDRESS	C. TRANSPORTER'S USEPA I.D. NO.	D. TRANSPORTER'S ILLINOIS EPA I.D. NO.
0001	CHEMICAL SERVICES CORPORATION 4601 W. 138TH ST. CRESTWOOD, IL 60445	ILD980701106	1301
0002	CHEMICAL WASTE MANAGEMENT 4300 W. 123RD ST. ALSIP, IL. 60658	ILD000806604	0075

XVII. PAGE NUMBER 004

GENERATOR ANNUAL REPORT/TSD FACILITY QUARTERLY REPORT

(1) FACILITY NAME: General Motors Desert Proving Ground

(2) LOCATION: P.O. Box 1506, 13303 S Ellsworth Road

(3) COUNTY: Maricopa

(4) EPA ID NUMBER: AZD021224479

(5) TYPE: GTSD

(6) QUARTERLY REPORT QUARTER: YEAR: ANNUAL REPORT YEAR: 1983

	(7) WASTE TYPE		(8) GENERATED ON-SITE	(9) RECEIVED FROM OFF-SITE	(10) INTRASTATE HAZARDOUS WASTE SHIPMENTS			(11) INTERSTATE HAZARDOUS WASTE SHIPMENTS		
	CHEMICAL NAME OR DESCRIPTION	EPA HAZARDOUS WASTE NO.	AMOUNT	AMOUNT	AMOUNT	UN/NA NUMBER	DESTINATION	AMOUNT	UN/NA NUMBER	DESTINATION
3.	Solvent Petroleum Distillate	D001	154 GAL ✓	—	—	—	—	—	—	—
5.	Thinner Compound	D001	15 GAL ✓	—	—	—	—	—	—	—
6.	Contaminated Gasoline	D001	19 GAL ✓	—	—	—	—	—	—	—
8.	Solvent Petroleum Distillate	D001	101 GAL ✓	—	—	—	—	—	—	—
10.	Water Treatment Liquid	D002	25 GAL ✓	—	—	—	—	—	—	—
12.	Thinner Compound	D001	55 GAL ✓	—	—	—	—	—	—	—
14.	Methanol Alcohol	D001	24 GAL ✓	—	—	—	—	—	—	—
15.	Sour Gasoline	D001	20 GAL ✓	—	—	—	—	—	—	—
16.	Contaminated Gasoline	D001	234 GAL ✓	—	—	—	—	—	—	—
18.	Thinner Compound	D001	18 GAL ✓	—	—	—	—	—	—	—
19. 20.	Spent Lead Acid Batteries	D002	1365 # ✓	—	—	—	—	—	—	—

42-590 O—85—63

(17) COMMENTS:

2-16-84
Date

Signature

GENERAL SUPERVISOR
Title

WASTE TYPE (con't from reverse)	(12) IN STORAGE ON-SITE AT END OF REPORTING PERIOD		(13) TOTAL TREATED ON-SITE		(14) TOTAL DISCHARGED TO SEWER OR WATERS OF THE U. S.		(15) TOTAL DISPOSED ON-SITE		(16) TOTAL RECYCLED OFF-SITE	
EPA #	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	DESTINATION
D001	154 GAL	TANK	—	—	—	—	—	—	—	—
D001	15 GAL	DRUM	—	—	—	—	—	—	—	—
D001	19 GAL	TANK	—	—	—	—	—	—	—	—
D001	101 GAL	TANK	—	—	—	—	—	—	—	—
D002	—	—	25 GAL	BI-CARB OF SODA	—	—	25 GAL	POURED INTO BIND SUMP TO NEUTRALIZED	—	—
D001	55 GAL	DRUM	—	—	—	—	—	—	—	—
D001	24 GAL	TANK	—	—	—	—	—	—	—	—
D001	20 GAL	TANK	—	—	—	—	—	—	—	—
D001	124 GAL 110 GAL	TANK DRUM	—	—	—	—	—	—	—	—
D001	18 GAL	DRUM	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	1365 #	AA JETT BATTERIES 1009 S 6TH STREET PHOENIX, ARIZONA

990

GENERATOR ANNUAL REPORT/TSD FACILITY QUARTERLY REPORT

(1) FACILITY NAME: GENERAL MOTORS LEGEND PROVING GROUND

(2) LOCATION: PO BOX 1506, 13303 S. ELLSWORTH ROAD

(3) COUNTY MARICOPA

(4) EPA ID NUMBER: AZD020122479

(5) TYPE: GTSD

(6) QUARTERLY REPORT QUARTER: YEAR:

ANNUAL REPORT YEAR: 1982

	(7) WASTE TYPE		(8) GENERATED ON-SITE	(9) RECEIVED FROM OFF-SITE	(10) INTRASTATE HAZARDOUS WASTE SHIPMENTS			(11) INTERSTATE HAZARDOUS WASTE SHIPMENTS		
	CHEMICAL NAME OR DESCRIPTION	EPA HAZARDOUS WASTE NO.	AMOUNT	AMOUNT	AMOUNT	UN/NA NUMBER	DESTINATION	AMOUNT	UN/NA NUMBER	DESTINATION
10	CONTAMINATED GASOLINE	D001	15 GAL ✓	—	—	—	—	—	—	—
3/ 11 12 19	SPENT LEAD ACID BATTERIES	D002	315 # ✓	—	—	—	—	—	—	—
18	THINNER COMPOUND	D001	25 GAL ✓	—	—	—	—	—	—	—
17	THINNER COMPOUND	D001	55 GAL ✓	—	—	—	—	—	—	—
42 43 45 46	SPENT LEAD ACID BATTERIES	D002	6345 # ✓	—	—	—	—	—	—	—
48	THINNER COMPOUND	D001	116 GAL ✓	—	—	—	—	—	—	—
49	SPENT 1,1,1 TRICHLOROETHANE	F002	195 GAL ✓	—	—	—	—	—	—	—
50 51 52	SPENT LEAD ACID BATTERIES	D002	665 # ✓	—	—	—	—	—	—	—
54	PETROLEUM DISTILLATE	D001	52 GAL ✓	—	—	—	—	—	—	—
55	SPENT LEAD ACID BATTERIES	D002	35 #	—	—	—	—	—	—	—
56	THINNER COMPOUND	D001	44 GAL	—	—	—	—	—	—	—

(17) COMMENTS:

3-16-94
Date

Signature

GENERAL SUPERVISOR MAINTENANCE
Title

WASTE TYPE (con't from reverse)	(12) IN STORAGE ON-SITE AT END OF REPORTING PERIOD		(13) TOTAL TREATED ON-SITE		(14) TOTAL DISCHARGED TO SEWER OR WATERS OF THE U. S.		(15) TOTAL DISPOSED ON-SITE		(16) TOTAL RECYCLED OFF-SITE	
EPA #	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	DESTINATION
D001	15 GAL	TANK	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	315 #	AA JETT BATTERIES 1009 S. 6TH STREET PHOENIX ARIZONA
D001	25 GAL	DRUM	—	—	—	—	—	—	—	—
D001	55 GAL	DRUM	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	6345 #	AA JETT BATTERIES 1009 S. 6TH STREET PHOENIX, ARIZONA
D001	116 GAL	DRUM	—	—	—	—	—	—	—	—
F002	195 GAL	DRUM	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	665 #	AA JETT BATTERIES 1009 S 6TH STREET PHOENIX, ARIZONA
D001	52 GAL	DRUM	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	—	AA JETT BATTERIES 1009 S. 6TH STREET PHOENIX, ARIZONA
D001	44 GAL	DRUM	—	—	—	—	—	—	—	—

GENERATOR ANNUAL REPORT/TSD FACILITY QUARTERLY REPORT

(1) FACILITY NAME: GENERAL MOTORS DESERT PROVING GROUND

(2) LOCATION: PO Box 1506, 13303 S. ELLSWORTH ROAD

(3) COUNTY MARICOPA

(4) EPA ID NUMBER: AZ4021224179

(5) TYPE: GTSD

(6) QUARTERLY REPORT QUARTER: YEAR: ANNUAL REPORT YEAR: 1983

	(7) WASTE TYPE		(8) GENERATED ON-SITE	(9) RECEIVED FROM OFF-SITE	(10) INTRASTATE HAZARDOUS WASTE SHIPMENTS			(11) INTERSTATE HAZARDOUS WASTE SHIPMENTS		
	CHEMICAL NAME OR DESCRIPTION	EPA HAZARDOUS WASTE NO.	AMOUNT	AMOUNT	AMOUNT	UN/NA NUMBER	DESTINATION	AMOUNT	UN/NA NUMBER	DESTINATION
59	RINSE FROM: 1 THINNER COMPOUND 2 111 TRICHLOROETHANE	D001 F002	50 GAL ✓	—	—	—	—	—	—	—
60	RINSE FROM: WATER TREATMENT LIQUID BASED	D002	155 GAL ✓	—	—	—	—	—	—	—
61	SPENT LEAD ACID BATTERIES	D002	2345 # ✓	—	—	—	—	—	—	—
62	SPENT 1,1,1, TRICHLOROETHANE	F002	53 GAL	—	—	—	—	—	—	—
63	METHANOL & WATER 50/50	D001	14 GAL ✓	—	—	—	—	—	—	—
64	PETROLEUM DISTILLATE	D001	55 GAL ✓	—	—	—	—	—	—	—
65	SPENT LEAD ACID BATTERIES	D002	1035 # ✓	—	—	—	—	—	—	—
66	SPENT 1,1,1, TRICHLOROETHYLENE	F002	17 GAL ✓	—	—	—	—	—	—	—
67	SPENT LEAD ACID BATTERY	D002	35 # ✓	—	—	—	—	—	—	—
68	THINNER COMPOUND	D001	55 GAL	—	—	—	—	—	—	—
69	SPENT LEAD ACID BATTERIES	D002	1935 #	—	—	—	—	—	—	—

(17) COMMENTS:

2-16-84
Date

Signature

GENERAL SUPERVISOR MAINTENANCE
Title

WASTE TYPE (con't from reverse)	(12) IN STORAGE ON-SITE AT END OF REPORTING PERIOD		(13) TOTAL TREATED ON-SITE		(14) TOTAL DISCHARGED TO SEWER OR WATERS OF THE U. S.		(15) TOTAL DISPOSED ON-SITE		(16) TOTAL RECYCLED OFF-SITE	
EPA #	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	DESTINATION
D001 F002	50 GAL	DRUM	—	—	—	—	—	—	—	—
D002	—	—	155 GAL	BI CARB OF SODA	—	—	155 GAL	POURED INTO BLIND SUMP & MIX COMPOUND	—	—
D002	—	—	—	—	—	—	—	—	2345 #	AA JETT BATTERIES 1009 S. 6TH STREET PHOENIX ARIZONA
F002	53 GAL	DRUM	—	—	—	—	—	—	—	—
D001	14 GAL	TANK	—	—	—	—	—	—	—	—
D001	55 GAL	DRUM	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	1095 #	AA JETT BATTERIES 1009 S. 6TH STREET PHOENIX ARIZONA
F002	17 GAL	DRUM	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	35 #	AA JETT BATTERIES 1009 S 6TH STREET PHOENIX ARIZONA
D001	55 GAL	DRUM	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	1925 #	AA JETT BATTERIES 1009 S. 6TH STREET PHOENIX ARIZONA

GENERATOR ANNUAL REPORT/TSD FACILITY QUARTERLY REPORT

(1) FACILITY NAME: GENERAL MOTORS DESERT PROVING GROUND

(4) EPA ID NUMBER: AZD020122479

(2) LOCATION: P.O. BOX 1506, 13303 S. ELLSWORTH ROAD

(5) TYPE: GTSD

(3) COUNTY: MARICOPA

(6) QUARTERLY REPORT QUARTER: YEAR:

ANNUAL REPORT YEAR: 1983

	(7) WASTE TYPE		(8) GENERATED ON-SITE	(9) RECEIVED FROM OFF-SITE	(10) INTRASTATE HAZARDOUS WASTE SHIPMENTS			(11) INTERSTATE HAZARDOUS WASTE SHIPMENTS		
	CHEMICAL NAME OR DESCRIPTION	EPA HAZARDOUS WASTE NO.	AMOUNT	AMOUNT	AMOUNT	UN/NA NUMBER	DESTINATION	AMOUNT	UN/NA NUMBER	DESTINATION
70	SPENT 1,1,1, TRICHLOROETHENE	F002	11 GAL ✓	—	—	—	—	—	—	—
71	RINSE FROM CONTAMINATED GASOLINE BARREL	D001	15 GAL ✓	—	—	—	—	—	—	—
72	SPENT LEAD ACID BATTERIES	D002	305 # ✓	—	—	—	—	—	—	—
73	RINSE FROM: CONTAMINATED GASOLINE BARREL	D001	17 GAL ✓	—	—	—	—	—	—	—
74	RINSE FROM WATER TREATMENT LIQUID BARREL	D002	35 GAL ✓	—	—	—	—	—	—	—
75	SPENT 1,1,1, TRICHLOROETHYLENE	F002	55 GAL ✓	—	—	—	—	—	—	—
76 & 77	ASBESTOS GLOVES	UN2590	45 # ✓	—	—	—	—	—	—	—
78	SPENT LEAD ACID BATTERIES	D002	2870 # ✓	—	—	—	—	—	—	—
79	RINSE FROM WATER TREATMENT LIQUID BARREL	D002	52 GAL ✓	—	—	—	—	—	—	—
80	THINNER COMPOUND	D001	55 GAL ✓	—	—	—	—	—	—	—
81	ASBESTOS COVERED WIRE	UN2590	150 # ✓	—	—	—	—	—	—	—

(13) COMMENTS:

2-10-84
Date

Signature

GENERAL SUPERVISOR MAINTENANCE
Title

WASTE TYPE (con't from reverse)	(12) IN STORAGE ON-SITE AT END OF REPORTING PERIOD		(13) TOTAL TREATED ON-SITE		(14) TOTAL DISCHARGED TO SEWER OR WATERS OF THE U. S.		(15) TOTAL DISPOSED ON-SITE		(16) TOTAL RECYCLED OFF-SITE	
EPA #	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	DESTINATION
F002	11 GAL	DRUM	—	—	—	—	—	—	—	—
D001	15 GAL	TANK	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	305 #	AA JETT BATTERIES 1009 S. 6TH STREET PHOENIX, ARIZONA
D001	17 GAL	TANK	—	—	—	—	—	—	—	—
D002	—	—	35 GAL	BI-CARB OF SODA	—	—	35 GAL	POURED INTO BRINE SUMP @ NM COMPANY	—	—
F002	55 GAL	DRUM	—	—	—	—	—	—	—	—
UN2590	45 #	DOUBLED PLASTIC BAGS & CONTAINERIZED	—	—	—	—	—	—	—	—
D002	—	—	—	—	—	—	—	—	2970 #	AA JETT BATTERIES 1009 S. 6TH STREET PHOENIX, ARIZONA
D002	—	—	52 GAL	BI-CARB OF SODA	—	—	52 GAL	POURED INTO BRINE SUMP @ NM COMPANY	—	—
D001	55 GAL	DRUM	—	—	—	—	—	—	—	—
UN2590	150 #	DOUBLED PLASTIC BAGS & CONTAINERIZED	—	—	—	—	—	—	—	—

GENERATOR ANNUAL REPORT/TSD FACILITY QUARTERLY REPORT

Page 1 of 13

(1) FACILITY NAME: GENERAL MOTORS DESERT PROVING GROUND

(4) EPA ID NUMBER: AZD020122479

(2) LOCATION: P.O. Box 1506, 19303 S. ELLSWORTH ROAD

(5) TYPE: G TSD

(3) COUNTY MARICOPA

(6) QUARTERLY REPORT QUARTER: YEAR:

ANNUAL REPORT YEAR: 1983

	(7) WASTE TYPE		(8) GENERATED ON-SITE	(9) RECEIVED FROM OFF-SITE	(10) INTRASTATE HAZARDOUS WASTE SHIPMENTS			(11) INTERSTATE HAZARDOUS WASTE SHIPMENTS		
	CHEMICAL NAME OR DESCRIPTION	EPA HAZARDOUS WASTE NO.	AMOUNT	AMOUNT	AMOUNT	UN/NA NUMBER	DESTINATION	AMOUNT	UN/NA NUMBER	DESTINATION
B2 & B3	SPENT LEAD ACID BATTERIES	D002	3665 # V	—	—	—	—	—	—	—
B4	METHANOL ALCOHOL	D001	41 GAL V	—	—	—	—	—	—	—
B5	ASBESTOS GLOVES	UN2590	2 # ✓	—	—	—	—	—	—	—
B6	SPENT LEAD ACID BATTERIES	D002	2800 # ✓	—	—	—	—	—	—	—

997

,17) COMMENTS:

2-16-84
Date

Signature

GENERAL SUPERVISOR MAINTENANCE
Title

WASTE TYPE (con't from reverse)	(12) IN STORAGE ON-SITE AT END OF REPORTING PERIOD		(13) TOTAL TREATED ON-SITE		(14) TOTAL DISCHARGED TO SEWER OR WATERS OF THE U. S.		(15) TOTAL DISPOSED ON-SITE		(16) TOTAL RECYCLED OFF-SITE	
EPA #	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	METHOD	AMOUNT	DESTINATION
D002	—	—	—	—	—	—	—	—	3665 #	AA JETT BATTERIES 1009 S. 6TH STREET PHOENIX, ARIZONA
D001	41 GAL	DRUM	—	—	—	—	—	—	—	—
UN 2590	.2 #	DOUBLED PLASTIC BAGS & CONTAINERIZED	—	—	—	—	—	—	—	—
D002	2800 #	PELLETS	—	—	—	—	—	—	—	—

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
LAND PROGRAM
1983 Hazardous Waste Generators Annual Report

I. Facility ID # [A|L|D|0|7|8|9|6|0|2|3|4|]

II. Facility Name Saginaw Steering Gear Division Of General Motors Corporation

III. Location of Facility U.S. Highway 31 South
(Street or Route Number)

Athens (City) | Limestone (County) | Alabama (State) | 35611 (Zip Code)

IV. Installation Contact Owen Wright (Name) 205-552-5249 (Area Code Telephone Number)

V. During 1983 the facility did [X] did not [ ] generate reportable amounts of hazardous waste. (If you check did not, skip to Item VII.)

VI. Waste Identification:

	A. EPA Waste Number	B. Waste Description	C. Amount of Waste (lbs)	D. Receiving Facility	E. Receiving Facility ID Number	F. Transporter Name	G. Transporter ID Number
1.	F001	Trichlorethane 111	21,220	Kloor Kleen	OHD063998090	Oil Service Co	TND089558019
2.	F005	Waste Paint/Toluene	9,969	Stauffer Chem	TND083525634	Oil Service Co	TND089558019
3.			7,576	Chem Waste Mgt	ALD000622464	Oil Service Co	TND089558019
4.	F006	Waste Water Treat Sludge	6,243,748	Metalworking	INT000646950	Oil Service Co	TND089558019
5.			1,558,320	Chem Waste Mgt	ALD000622464	Chem Waste Mgt	ALD000622464
6.						Oil Service Co	TND089558019

VII. Certification:

Signature W. Blair Thompson W. Blair Thompson (Print or Type)

Title General Manager, Saginaw Steering Gear

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

666

ATTACHMENT 1

VI. Waste Identification Continuation Sheet:

	A. EPA Waste Number	B. Waste Description	C. Amount of Waste (lbs)	D. Receiving Facility	E. Receiving Facility ID Number	F. Transporter Name	G. Transporter ID Number
7.	F006	Waste Water Treat Sludge	91,860	Systech	TND000772277	Oil Service Co	TND089558019
8.	F008	Zinc Phosphate Sludge	158,900	Chem Waste Mgt	ALD000622464	Oil Service Co	TND089558019
9.	K062	Spent Pickle Liquor	3,800,780	Resource Recyg	TND000603589	Tennessee Oil	TND081455891
10.						Chem Haulers	TND000770180
11.						Fleet Transport	TND008867335
12.						AAA Septic	ALD055905079
13.						Bryson Indust.	SCD000822312
14.							
15.							
16.							
17.							
18.							
19.							
20.							
21.							
22.							
23.							
24.							
25.							

1000

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

OHD007247958 11

II. NAME OF INSTALLATION

HARRISON RADIATOR GM CORP DAYTON PLANT

III. INSTALLATION MAILING ADDRESS

P O BOX 824

Street or P.O. Box

DAYTON OH 45401

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

5300 TAYLOR ST 57

County Code

DAYTON OH 45401 3585

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

SANDY RIORMAN 513-279-4423

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year

OHD000724161
OHD004178612
OHD093945293

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

William A. Cole | Plant Manager-Dayton Plant | W A Cole | 17FEB84

Print/Type Name | Title | Signature of Authorized Representative | Date Signed

EPA 9019

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO. T/AC

G O H D 0 1 7 9 5 8 6 0 4 12

IX. FACILITY'S EPA I.D. NO.

O H D 0 0 4 1 7 8 6 1 2

X. FACILITY NAME

R E S E A R C H O I L C O M P A N Y

XI. FACILITY'S ADDRESS

2655 TRANSPORT RD

Street or P.O. Box

CLEVELAND OH 44115

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste Oil Spent Degreasing Solv. Mix.	0 1	F 0 0 1	7 0 0 0 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by set hon number)

XII. 10,000 Gal. x 7 #/Gal. = 70,000#

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(Specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO. T/AC

OHD017958604 12

IX. FACILITY'S EPA I.D. NO.

OHD093945293

X. FACILITY NAME

SOLVENT RECOVERY INC

XI. FACILITY'S ADDRESS

4301 INFIRMARY RD

Street or P.O. Box

WEST CARROLLTON OH 45449

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste Oil Spent Degreasing Solv. Mix	01	F001	40733	P
2	1-1-1 Trichloroethane Still Bottoms	12	F001	16138	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

XII. Line 1 5819 Gals. x 7 #/Gal. = 40,733#

XII. Line 2 1681 Gals. x 9.6 #/Gal. = 16,138#

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

(1) OHD00081757 (2) (3) (4) (5) (6)

II. NAME OF INSTALLATION

(7) HARRISON RADIATOR GMC MORAINE PLANT

III. INSTALLATION MAILING ADDRESS

(8) P O BOX 824

Street or P.O. Box

(9) DAYTON 0H 45401

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

(10) 3600 DRYDEN RD 57

County Code

(11) MORAINE 0H 45439 3585

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

(12) SAWDEY NORMAN 513-297-4423

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year.)

OHD045247905 OHD072864390
OHD000724161
OHD075037747

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Larry L. Netzley | Plant Manager-Moraine Plant | Larry L Netzley | 2/16/84

Print/Type Name | Title | Signature of Authorized Representative | Date Signed

EPA 8019

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C O H D 0 0 0 9 1 7 5 7 7 12

1 2 13 14 15

IX. FACILITY'S EPA I.D. NO.

O H D 0 4 5 2 4 3 7 0 6

16 27

X. FACILITY NAME

F O N D E S S Y E N T E R P R I S E S I N C

28 59

XI. FACILITY'S ADDRESS

8 7 6 O T T E R C R E E K R D

28

Street or P.O. Box

O R E G O N O H 4 3 6 1 6

28

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Wastewater Treat. Slud. From Elect. Op	1 2	F 0 0 6	1 1 1 8 1 5 4 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

25 26 10 14 17 41 42 45 46 54 55

XIII. COMMENTS (enter information by section number)

Page 3 of 6

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO. T/AC

OHD008117577 12

IX. FACILITY'S EPA I.D. NO.

OHD081290611

X. FACILITY NAME

TRICIL ENVIRONMENTAL SERVICES

XI. FACILITY'S ADDRESS

4350 EDGEWYN AVE

Street or P.O. Box

HILLIARD OH 43026

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Wastewater Treat. Sl. From Elect. Op	1 2	F006	9312080	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

OHD 000 817 577 12

IX. FACILITY'S EPA I.D. NO.

ALD 000 624 264

X. FACILITY NAME

CHEMICAL WASTE MGMT EMELLE FAC.

XI. FACILITY'S ADDRESS

PO BOX 55

Street or P.O. Box

EMELLE AL 35459

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste Paint	07	D001 D001 D007	386	P
2	Waste Paint	07	D001	281	P
3	Combustible Liquid	01	D001	4510	P
4	Perchloroethylene In Inert Absorb.	12	F001	470	P
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

OHD 009 394 529 3 (1-12, 13-15)

IX. FACILITY'S EPA I.D. NO.

OHD 093 945 293 (16-27)

X. FACILITY NAME

SOLVENT RECOVERY INC (28-59)

XI. FACILITY'S ADDRESS

4301 INFIRMARY RD (28)

Street or P.O. Box

WEST CARROLLTON OH 45449 (28)

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste Resin Solution	07	D001	7884	P
2	Waste Xylene	07	U239	2212	P
3	Waste Paint Thinner	07	D001	55	P
4	Waste Petroleum Distillate	01	D001	1730	P
5	Waste 1-1-1 Trichloroethane	12	F001	3613	P
6	Waste Flammable Liquid	07	D001	450	P
7	Waste Lacquer Thinner	07	D001	14715	P
8					
9					
10					
11					
12					

(B: 28, 29; C: 30–37, 40–45; D: 46–54; E: 55)

XIII. COMMENTS (enter information by section number)

1009

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T A C

F	M	1	D	0	0	0	7	1	8	5	5	1		1
1	2										13	14	15	

III. NAME OF INSTALLATION

| H | Y | D | R | A | - | M | A | T | I | C | | D | I | V | I | S | I | O | N, | | G | M | C | | | | | | | | | |

...tries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A/C														
C	M	1	D	0	0	7	1	8	5	5	1		1	
1	2									13	14		15	

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chems..., Inc.

X. FACILITY'S EPA I.D. NO.

F	I	N	D	9	8	0	5	9	0	9	4	7
16												28

XI. FACILITY ADDRESS

P. O. Box 1433
South Bend, Indiana 46624

XII. TRANSPORTATION SERVICES USED

Chemsolv, Inc.
IND980590947

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Mixture of spent 1,1,1-Trichloroethane and 1,1,2-Trichloro	1 5 (33 34)	F 0 0 1 (35 38) F 0 0 2 (39 42)	7 1 5 (43 46 47 50 51 59)	G (60)
	2	1,2,2, Trifluoroethane				
	3	Ignitable spent solvent used in paint shipping & cleaning;	0 8	D 0 0 1	4 4 0	G
	4	mineral spirits				
	5	Ignitable liquid recovered from a spill in parking lot:gasoline	0 8	D 0 0 1	3 0	G
	6	Ignitable paint waste, off-specification paint	0 8	D 0 0 1	5 5	G
	7	Ignitable paint waste; off-specification paint and paint		D 0 0 1	5 5	G
	8	sludge	0 1			
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

SECTION XIII

Line #1 - F001 = 11.3 lb/gal
F002 = 13.0 lb/gal
Line #3 - D001 = 7.2 lb/gal
Line #5 - D001 = 5.8 lb/gal
Line #6 - D001 = 8.7 lb/gal
Line #7 - D001 = 8.7 lb/gal

Reported on Facility Biennial Report (TSD Form)

Type entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A/C
C M 1 D 0 0 0 7 1 8 5 5 1 1 1
1 2 13 14

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Continental Waste Systems, Inc.

X. FACILITY'S EPA I.D. NO.

F I N D 0 8 8 7 3 7 2 7 5
16 28

XI. FACILITY ADDRESS

3651 N. Clinton St
Fort Wayne, Indiana 46805

XII. TRANSPORTATION SERVICES USED

Sturgis Iron & Metal (Michiana Solid Refuse Service)
MID018898087

XIII. WASTE IDENTIFICATION

Sequence #	* Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Corrosive off-specification powdered compound used in	D 2 (33 34)	D 0 0 2 (35 36 39 42)	7 0 0 (43 46 47 50 51 59)	P (60)
	2	derust operations;67% sodium hydroxide				
	3	Corrosive acid waste,spent sulfuric acid	D 2	D 0 0 2	5	G
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

SECTION X111

Line #3 - D002 = 15.3 lb/gal

Reported on Facility Biennial Report (TSD Form)

...e entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M 1 D 0 0 0 7 1 8 5 5 1 1 1
(T A C)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

F

XII. TRANSPORTATION SERVICES USED

\

XIII. WASTE IDENTIFICATION

Sequence #	B. WDI Hazard Code	A. Description of Waste	B. WDI Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1		Ignitable spent solvent used in paint thinning and cleaning,	0 8	D 0 0 1	3 5	G
2		mineral spirits				
3		Mixture of spent toluene, Methanol, and MIBK	1 5	F 0 0 3 F 0 0 5	4 2	G
4		Spent Acetone	0 8	F 0 0 3	1 9	G
5		Mixture of spent 1,1,1-Trichloroethane and 1,1,2-Trichloro,				
6		1,2,2-Trifluoroethane	1 5	F 0 0 1 F 0 0 2	5	G
7						
8						
9						
10						
11						
12						

XIV. COMMENTS (enter information by section number - see instructions)

SECTION XIII

"1983 Generated-Stored on site less than 90 days as of December 31,1983"

Line #1 - D001 = 7.2 lb/gal

Line #3 - F003 Methanol = 6.6 lb/gal
F003 MIBK = 6.7 lb/gal
F005 = 7.2 lb/gal

Line #4 - F003 = 6.6 lb/gal

Line #5 - F001 = 11.3 lb/gal
F002 = 13.0 lb/gal

Reported on Facility Biennial Report (TSD Form)

1013

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-84

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T X C

F M I D 9 8 0 5 8 7 8 9 3 1

1 2 13 14 15

III. NAME OF INSTALLATION

GMC HYDRA-MATIC DIVISIPSILANTI

30 69

IV. INSTALLATION MAILING ADDRESS

3 WILLOW RUN

15 16 4

Street or P.O. Box

4 YPSILANTI MI 48197

13 16 41 42 47 51

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5

15 16 45

Street or Route number

6

15 16 41 42 47 5

City or Town State Zip Code

VI. INSTALLATION CONTACT

2 HOPKINSON HARRY

15 16 45

Name (last and first)

3 1 3 - 4 8 5 - 5 2 5 6

40 53

Phone No. (area code & no.)

VII. CERTIFICATION

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER THE DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

D. C. Forshee — Gen. Mfg. Manager — D Forshee — 2-17-84

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.
C M I D 9 8 0 5 8 7 8 9 3 T/A C
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
Edward Oil Service

X. FACILITY'S EPA I.D. NO.
F M I D 0 8 8 7 5 4 6 6 8
16 28

XI. FACILITY ADDRESS
530 S. Rouge
Detroit, MI 48217

XII. TRANSPORTATION SERVICES USED
Edwards Oil Service

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	Corrosive Liquid Nos. Waste Sulfuric Acid-Alum Water	0 2	D 0 0 2 / D 0 0 7	8 3 5 0 2 0	P ✓
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 5 8 7 8 9 3 F T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal

X. FACILITY'S EPA I.D. NO.

F M I D 0 4 8 0 9 0 6 3 3

XI. FACILITY ADDRESS

49350 N. Service Dr.
Belleville, MI 48111

XII. TRANSPORTATION SERVICES USED

Recovery Specialists
P.O. Box 255
Saline, MI 48176
MID000722652

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	III Trichloroethane Contaminated Floor Dry	1 3	F 0 0 1	2 5 0	P ✓
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C M I D 9 8 0 5 8 7 8 9 3 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control Inc.

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2

XI. FACILITY ADDRESS

27140 Princeton
Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Environmental Waste Control Inc.
27140 Princeton
Inkster, Michigan 48141

MID052042959
Ray Molder
8300 S. Beech Daly
Taylor, Michigan 48180

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. (DOT) Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Industrial Waste Oil		D 0 0 1	1 0 4 7 6 8 3 0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 9 8 0 5 8 7 8 9 3 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Edwards Oil Service

X. FACILITY'S EPA I.D. NO.

F M I D 0 8 8 7 5 4 6 6 6

XI. FACILITY ADDRESS

530 S. Rouge
Detroit, Michigan 48217

XII. TRANSPORTATION SERVICES USED

Edwards Oil Service
530 S. Rouge
Detroit, Michigan 48217

XIII. WASTE IDENTIFICATION

Sequence #	Line	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Industrial Waste Oil		D 0 0 8	1 4 2 2 7 9 8 0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

5 5

1018

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

(1) Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☒ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T A C

F	M	1	D	0	0	0	7	2	4	7	4	0		1
1	2											13	14	15

III. NAME OF INSTALLATION

| H | Y | D | R | A | - | M | A | T | I | C | | D | I | V | I | S | I | O | N, | | G | M | C | | | | | | | | | | |

Do not make entries in shaded areas — OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

T/A C

[F] M I D 0 1 0 5 3 5 6 8 4 [ ]
1 2 13 14 15

This Installation's Non-Regulated Status Is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

H I X I D I R I A I - I M A I T I I C I [W] A R R I E I N I P I L I A I N T I
30 69

IV. INSTALLATION MAILING ADDRESS

[3] 2 3 5 0 0 M O U N D R O A D
15 16 45
Street or P.O. Box

[4] H A R R I E T
15 16 41 42
City or Town

M I 4 8 0 9 1
47 51
State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

[5] _____
15 16 45
Street or Route number

[6] _____
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

[7] J O S E P H R U N N
15 16 45
Name (last and first)

3 1 3 - 5 6 5 - 1 0 1 5
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER THE DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

D.C. Forshee Gen. Mfg. Manager [signature] 2/17/84

Print/Type Name Title Signature of Authorized Representative Date Signed

Tear out here

Do not make entries in shaded areas.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 8 1 1 T/A C RE-DEN

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET

X. FACILITY'S EPA I.D. NO.

F M I D 0 9 8 6 9 5 2 9 4

XI. FACILITY ADDRESS

18550 Allen Rd.
Wyandotte, MI. 48192

XII. TRANSPORTATION SERVICES USED

MID 096963194
CHEM-MET
18550 Allen Rd.
Wyandotte, MI. 48192

MID 004914032
DOESCH
5435 E. Davison
Detorit, MI. 48211

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Oily Sludge E.P. Toxic	115	D 0 0 7	1 5 0 2 4 9 0 0	P
	2	Paint Sludge , Flammable Liquid	0 8	D 0 0 1	1 4 3 0 0 0	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: Recd by:

VIII. GENERATOR'S EPA I.D. NO.

C M I D 0 0 5 3 5 6 8 1 1 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

TRI CIL ENVIRONMENTAL SERVICES

X. FACILITY'S EPA I.D. NO.

F M I D 0 7 2 5 8 5 7 5 5

XI. FACILITY ADDRESS

3030 Wood
Muskegon Heights, MI. 49444

XII. TRANSPORTATION SERVICES USED

MID 000717074
Wooster Industrial Services
23331 Liberth
St. Clair Shores, MI. 48080

XIII. WASTE IDENTIFICATION

Sequence Number	Line	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Oily Sludge E.P. Toxic	1 5	D 0 0 7	1 5 9 0 3 4	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

42-590 O—85——65

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date Rec'd: / / Rec'd by:

VIII. GENERATOR'S EPA I.D. NO.

G | M | I | D | 0 | 1 | 0 | 5 | 3 | 5 | 6 | 8 | 1 | 1 | T/A C E

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Wayne Disposal

X. FACILITY'S EPA I.D. NO.

F | M | I | D | 0 | 4 | 8 | 0 | 9 | 0 | 6 | 3 | 3 |

XI. FACILITY ADDRESS

49350 N. Service Dr.
Belleville, Mi. 48111

XII. TRANSPORTATION SERVICES USED

MID 004914032
Doesch
5435 E. Davison
Detroit, Mi. 48211

XIII. WASTE IDENTIFICATION

Sequence Number	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Plastic With Caustic Soda		D002	9.03.7	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

FOR DEPARTMENT USE:
Index Number:
Date Received:

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44396
BATON ROUGE, LOUISIANA 70804

QUARTERLY REPORT OF ON-SITE DISPOSAL

1. IDENTIFICATION NUMBER: GD-806 QUARTER ENDING: 3-31-83
2. NAME OF COMPANY: Guide Division, General Motors
3. MAILING ADDRESS: P. O. Box 4707, Monroe, LA 71211
4. CONTACT: Stephen B. Densford P.E. TELEPHONE: 343-7000
5. HAZARDOUS WASTE DISPOSED OF ON-SITE THIS QUARTER:

Waste Number	Amount in Tons	Method of Disposal
806-05	61.8	Chemical treatment

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby cert. under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen B Densford (Name) Stephen B. Densford — April 11, 1983 (Date Signed)

FOR DEPARTMENT USE:

Index Number: _____

Date Recieved: _____

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44066
BATON ROUGE, LOUISIANA 70804

TRANSPORTER MANIFEST QUARTERLY REPORT

- IDENTIFICATION NUMBER: GD-806 QUARTER ENDING: 3-31-83
- NAME OF COMPANY: Guide Division, General Motors
- MAILING ADDRESS: P. O. Box 4707 Monroe, LA 71211
- CONTACT: Stephen B. Densford
- HAZARDOUS WASTE HANDLED DURING THIS QUARTER:

Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)
806-06	11.16				

- MANIFEST SEQUENCE NUMBERS USED DURING THIS QUARTER:

13					

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen B. Densford Plant Engr. Supv. April 11, 1983
Name and Title Date
Stephen B. Densford

If additional sheets are required, please put your identification number and date on each sheet.

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44066
BATON ROUGE, LOUISIANA 70804

GENERATOR MANIFEST QUARTERLY REPORT

IDENTIFICATION NUMBER: GD-806 QUARTER: (circle one) 1 (2) 3 4 , 19 83

NAME OF COMPANY: Guide Division, G.M.C.

MAILING ADDRESS: P. O. Box 4707, Monroe, LA 71211

CONTACT: S. B. Densford PHONE: 318-343-7000

SUMMARY OF HAZARDOUS WASTE GENERATED THIS QUARTER

Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)
806-06	23.73				
806-01	14.56				

Total Tons Generated: [ ]

MANIFEST SEQUENCE NUMBERS USED DURING THIS QUARTER:

GD-806-14					
GD-806-15					
GD-806-16					
GD-806-17					

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen B Densford Comm Engr. July 7, 1983
Name and Title Date

If additional sheets are required, please put your identification number and date on each sheet

HW-4 (R-6/83) Additional instructions are on the back of this form.

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44396
BATON ROUGE, LOUISIANA 70804

ON-SITE DISPOSER QUARTERLY REPORT

1. IDENTIFICATION NUMBER: GD-806 QUARTER: circle one 1 (2) 3 4 . 19 83
2. NAME OF COMPANY: Guide Division, G.M.C.
3. MAILING ADDRESS: P. O. Box 4707, Monroe, LA 71211
4. CONTACT: S. B. Densford TELEPHONE: 318-343-7000
5. SUMMARY OF HAZARDOUS WASTE HANDLED THIS QUARTER:

Waste number	Amount in Tons	Handling Code	Method of Disposal
GD-806-05	70.39	T31	Neutralization
TOTAL TONS HANDLED:			

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen B Densford (Name) July 7, 1983 (Date Signed)

If additional sheets are required, please put your identification number and the date on each sheet.

FOR DEPARTMENT USE:

Index Number: _____

Date Received: _____

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44066
BATON ROUGE, LOUISIANA 70804

GENERATOR MANIFEST QUARTERLY REPORT

1. IDENTIFICATION NUMBER: LD-806 QUARTER ENDING: September, 1983
2. NAME OF COMPANY: Gulde Division, G.M.C.
3. MAILING ADDRESS: P. O. Box 4707, Monroe, LA 71211
4. CONTACT: S. B. Densford 318-343-7000
5. HAZARDOUS WASTE HANDLED DURING THIS QUARTER:

Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)
806-06	14.19				
806-01	1.66				

6. MANIFEST SEQUENCE NUMBERS USED DURING THIS QUARTER:

LD-806-18					
LD-806-19					

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen B Densford Name and Title 9-27-83 Date

If additional sheets are required, please put your identification number and date on each sheet.

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44396
BATON ROUGE, LOUISIANA 70804

ON-SITE DISPOSER QUARTERLY REPORT

1. IDENTIFICATION NUMBER: GD-806 QUARTER: circle one 1 2 (3) 4 , 19 83
2. NAME OF COMPANY: Guide Division, G.M.C.
3. MAILING ADDRESS: P. O. Box 4707, Monroe, LA 71211
4. CONTACT: S. B. Densford TELEPHONE: 318-343-7000
5. SUMMARY OF HAZARDOUS WASTE HANDLED THIS QUARTER.

Waste number	Amount in Tons	Handling Code	Method of Disposal
No waste disposed of on-site this quarter.			
TOTAL TONS HANDLED:			

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen B Densford (Name) 9-27-83 (Date Signed)

If additional sheets are required, please put your identification number and the date on each sheet.

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44396
BATON ROUGE, LOUISIANA 70804

ON-SITE DISPOSER QUARTERLY REPORT

1. IDENTIFICATION NUMBER: LAD 067 033 944 (GD-806) QUARTER: circle one 1 2 3 (4) , 19 83
2. NAME OF COMPANY: Guide Division, G.M.C.
3. MAILING ADDRESS: P.O. Box 4707, Monroe, LA 71211
4. CONTACT: S. R. Densford TELEPHONE: 318-343-7000
5. SUMMARY OF HAZARDOUS WASTE HANDLED THIS QUARTER:

Waste number	Amount in Tons	Handling Code	Method of Disposal
No Waste Disposed of on-site this quarter.			
TOTAL TONS HANDLED:			

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen D. Densford (Name) 1-13-84 (Date Signed)

If additional sheets are required, please put your identification number and the date on each sheet.

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44066
BATON ROUGE, LOUISIANA 70804

GENERATOR MANIFEST QUARTERLY REPORT

1. IDENTIFICATION NUMBER: LAD 067 033 944 (GD-806) QUARTER: (circle one) 1 2 3 (4) 19 83
2. NAME OF COMPANY: Guide Division, G.M.C.
3. MAILING ADDRESS: P.O. Box 4707, Monroe, LA 71211
4. CONTACT: S. B. Densford PHONE: 318-343-7000
5. SUMMARY OF HAZARDOUS WASTE GENERATED THIS QUARTER:

Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)
GD806-06	15.34				
		Total Tons Generated:	15.34		

6. MANIFEST SEQUENCE NUMBERS USED DURING THIS QUARTER:

GD-806-20					

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen B Densford — Name and Title — 1-13-84 Date

If additional sheets are required, please put your identification number and date on each sheet

HW-4 (R-6/83) Additional instructions are on the back of this form.

FOR DEPARTMENT USE:
Index Number _____
DateReceived _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44066
BATON ROUGE, LOUISIANA 70804

GENERATOR MANIFEST QUARTERLY REPORT

1. IDENTIFICATION NUMBER: LAD 067 033 944 (GD-806) QUARTER (Circle one) (1) 2 3 4 19 84
2. NAME OF COMPANY: Guide Division, G.M.C.
3. MAILING ADDRESS: P.O. Box 4707, Monroe, LA 71211
4. CONTACT: S. B. Densford PHONE: 318-343-7000
5. SUMMARY OF HAZARDOUS WASTE GENERATED THIS QUARTER

Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)	Code Waste Number	Amount (Tons)
F-001 (GD-806-02)	29.1				
F-006 (GD-806-06)	26.66				
		Total Tons Generated:	55.76		

6. MANIFEST SEQUENCE NUMBERS USED DURING THIS QUARTER:

GD-806-21					
GD-806-22					
GD-806-23					
GD-806-24					

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen B. Densford Stephen B. Densford, Sr. Environmental Engr. April 5, 1984
Name and Title Date

If additional sheets are required, please put your identification number and date on each sheet

HW-4 (R-6/83) Additional instructions are on the back of this form.

FOR DEPARTMENT USE:
Index Number _____
Date Received _____
Add ☐ Replace ☐ Delete ☐

STATE OF LOUISIANA
DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE MANAGEMENT
POST OFFICE BOX 44396
BATON ROUGE, LOUISIANA 70804

ON-SITE DISPOSER QUARTERLY REPORT

1. IDENTIFICATION NUMBER: LAD 067 033 944 (GD-806) QUARTER: circle one (1) 2 3 4 , 19 84
2. NAME OF COMPANY: Guide Division, G.M.C.
3. MAILING ADDRESS: P.O. Box 4707, Monroe, LA 71211
4. CONTACT: S. B. Densford TELEPHONE: 318-343-7000
5. SUMMARY OF HAZARDOUS WASTE HANDLED THIS QUARTER:

Waste number	Amount in tons	Handling Code	Method of Disposal
No Waste Disposed of on-site this quarter.			
TOTAL TONS HANDLED:	0		

CERTIFICATION: I have personally examined and am familiar with the information submitted in this document, and I hereby certify under penalty of law that this information is true, accurate and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen B Densford Stephen B. Densford (Name) April 5, 1984 (Date Signed)

If additional sheets are required, please put your identification number and the date on each sheet.

STATE OF LOUISIANA
Department of Natural Resources
Office of Environmental Affairs
Solid Waste Management Division
Post Office Box 44066
Baton Rouge, Louisiana 70804

FOR DEPARTMENT USE ONLY:

Received _____
Reviewed _____

INDUSTRIAL SOLID WASTE GENERATOR QUARTERLY REPORT

1. Identification Number LAD 067 033 944 (GD-806) Quarter: 1 2 (3) 4, 19 84
2. Name of Generator Guide Division, G.M.C.
3. Mailing Address P. O. Box 4707, Monroe, LA 71211
4. Contact S. B. Densford Telephone (318) 343-7000

5. SUMMARY OF INDUSTRIAL SOLID WASTE GENERATED THIS QUARTER:
(If additional sheets are required, please put your identification number and the date on each sheet)

WASTE NUMBER	AMOUNT	COLLECTOR/TRANSPORTER	DISPOSER
*	232.3 tons	*	

* These numbers have not been assigned as of this date.

TOTAL AMOUNT GENERATED 232.3 tons

6 CER. ICATION: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature [signature] Date April 5, 1984

Name and Title D. Steve Miller, Plant Manager

9/81

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. ☐

Explain your non-regulated status in the space below.

II. FACILITY EPA I.D. NUMBER

M O D 0 0 0 8 2 2 6 6 8

This Facility's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other (explain in comment section)

III. NAME OF FACILITY

G M ASSEMBLY DIVISION - LEEDS PLANT

IV. FACILITY MAILING ADDRESS

6817 STADIUM DRIVE

Street or P.O. Box

KANSAS CITY | MO | 64129

City or Town | State | Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

Street or Route number

City or Town | State | Zip Code

VI. FACILITY CONTACT

PEMBERTON, LARRY

Name (last and first)

(913) 281-7388

Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

A. Cost Estimate for Facility Closure: $ 130,000

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only): $

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

W. J. SLACHTA, PLANT MANAGER — 12-14-83

Print/Type Name | Title | Signature of Authorized Representative | Date Signed

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

M 0 0 0 0 0 8 2 2 6 6 8

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

GM ASSEMBLY-LEEDS PLANT ON SITE ☒

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

M 0 0 0 0 0 8 2 2 6 6 8

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 1 5 4 0 G (AMOUNT OF WASTE / UOM) S02 (AMOUNT OF WASTE / UOM) S03 (AMOUNT OF WASTE / UOM)

S04 (AMOUNT OF WASTE / UOM) S05 (AMOUNT OF WASTE / UOM)

XIV. WASTE IDENTIFICATION

Line	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Method (enter code)	D. Amount of Waste	E. Unit of Measure (enter code)
1	WASTE SOLVENT	D 0 0 1	S 0 1	4 8 5 9 0	G
2	CHROME TREATMENT SLUDGE	F 0 0 6	S 0 1	8 8 0	G
3	WASTE SEALERS	D 0 0 8	S 0 1	3 0 8 0	G
4	FLOW COAT WASTE	D 0 0 1	S 0 1	1 1 0 0	G
5	ELPO WASTE	D 0 0 8	S 0 1	1 2 1 0	G
6	WASTE PAINT	D 0 0 1	S 0 1	3 1 1 5	G
7					
8					
9					
10					
11					
12					

XV. COMMENTS (enter information by section number - see instructions)

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983
Read All Instructions Carefully Before Making Any Entries on Form

Tear out here

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Explain your non-regulated status in the space below.

II. FACILITY EPA I.D. NUMBER

T A C
M O D 0 0 6 2 9 0 1 1 8
1 2 13 14 15

This Facility's Non-Regulated Status is Expected to Apply:
☐ For 1983 Only ☐ Permanently
☐ Other (explain in comment section)

III. NAME OF FACILITY

G M T R U C K & B U S M F G D I V S T L O U I S P L A N T
10 69

IV. FACILITY MAILING ADDRESS

3 8 0 9 U N I O N B L V D
15 16 45
Street or P.O. Box

S T L O U I S | M O | 6 3 1 1 5
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

15 16 45
Street or Route number

15 16 41 42 47 51
City or Town State Zip Code

VI. FACILITY CONTACT

V A L D E Z A T P L A N T E N G I N E E R
15 16 45
Name (last and first)

3 1 4 – 6 7 9 – 5 1 5 0
46 55
Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

$ 1 5 2 1 0 0 0 $
16 19 22 25 28 31

A. Cost Estimate for Facility Closure

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

G. R. WILKINSON PLANT MANAGER G. R. Wilkinson 2/28/84
Print/Type Name Title Signature of Authorized Representative Date Signed

Page 1 of ____

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

IX. FACILITY'S EPA I.D. NO. [redacted] (T A C)

X. GENERATOR'S EPA I.D. NO. [redacted]

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)
GM TRUCK & BUS MFG. DIV.
ST. LOUIS PLANT
ON-SITE ☐

XII. GENERATOR ADDRESS
3809 UNION BLVD.
ST. LOUIS, MO. 63115

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ] AMOUNT OF WASTE [ ] UOM
S02 [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ] AMOUNT OF WASTE [ ] UOM
S03 [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ] AMOUNT OF WASTE [ ] UOM
S04 [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ] AMOUNT OF WASTE [ ] UOM
S05 [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ] AMOUNT OF WASTE [ ] UOM

XIV. WASTE IDENTIFICATION

Line	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
1	Ignitable solvents from paint spray purge, mixture of xylene, toluene, aliphatics, esters	D001	S01/S02	193,720,818	P
2	Ignitable solvents from paint spray purge, mixture of xylene, toluene, aliphatics, esters	D001	S01	10,137	P
3	Ignitable waste sealers and adhesives from truck manufacture, mixture of various solvents	D001	S02	8,715	P
4	Corrosive residue from paint shopper, contains lead and chromium	D002 D007	S01	11,559	P
5	Tank bottoms from metal cleaning, contains chromium, lead	D008 D007 D008	S01	13,221	P
6	Prime paint sludge from truck spray paint booths, contains chromium	D007	S01	166,197	P
7	Prime paint sludge from truck spray paint booths, contains chromium	D007	S05	44,924,44	P
8	Unused paint from flowcoat prime tank, mixture of toluene, aliphatics, aromatics, chromate	D001 D007	S01	26,238	P
9					
10					
11					
12					

XV. COMMENTS (enter information by section number—see instructions)

XIV, Line 7, C: 20 cubic yard waste transport container

Page ____ of ____

Form 8700-1

WID006427215 2 41 66 M
STEPHEN IRWIN ASST SUPT
GENERAL MOTORS CORP-DELCO ELECTRO
700 E FIRMIN STREET MS 9152
KOKOMO IN 46901

WID006427215 2 41 66 L
GENERAL MOTORS CORP-DELCO ELECTRO
7929 S HOWELL AVENUE
OAK CREEK WI 53154

I. TYPE OF HAZARDOUS WASTE REPORT

PART A: GENERATOR ANNUAL REPORT

This report is for the year ending Dec. 31. 19

PART B: FACILITY QUARTERLY REPORT

This report for period ending (Check one)

☐ 1. March 31 ☐ 3. Sept. 30
☐ 2. June 30 ☐ 4. Dec. 31 19

LEAVE BLANK - DNR USE ONLY

YY MM DD

INSTRUCTIONS: There may be a preprinted label attached to this report form. If any of the information on the label is incorrect, draw a line through and supply the correct information in the appropriate section below. If the label is complete and correct, leave sections II, III, IV, V and VI below blank. Section VII, Certification, must be completed regardless that other sections are left blank. If there is not a preprinted label, complete all sections. "Facility" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions for generators or facilities before completing this form. The information requested herein is required by Chapter NR 181, Wis. Adm. Code.

II. FACILITY'S EPA I.D. NUMBER

T/A

2 W I D 0 0 6 4 2 7 2 1 5

III. NAME OF FACILITY

3 D E L C O E L E C T R O N I C S D I V I S I O N , G M C

IV. FACILITY MAILING ADDRESS

C Street or P.O. Box

5 7 0 0 E F I R M I N S T

C City or Town State Zip Code

6 K O K O M O I N 4 6 9 0 2 -

V. LOCATION OF FACILITY

C Street or Route County

7 7 9 2 9 S H O W E L L A V E N U E M I L W A U K E E

C City or Town State Zip Code

8 O A K C R E E K W I 5 3 1 5 4 -

VI. FACILITY CONTACT

C Name (First, Last) and Position Title Telephone Number

9 J U D Y W E B E R , E N V I R O N M E N T A L E N G 3 1 7 4 5 9 1 4 0 6

VII. CERTIFICATION

I certify under penalty of law, that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name (Print or Type)
Paul H. Luchtefeld

Official Title
Asst. Superintendent Environmental Engineering

Signature
Paul H. Luchtefeld

Date Signed
5/29/87

FACILITY QUARTERLY HAZARDOUS WASTE REPORT

Required under Chapter 144, Wis. State.
Form 4430-7

WID004427215 2 41 66 L
GENERAL MOTORS CORP-DELCO ELECTRON
7929 S HOWELL AVENUE
OAK CREEK WI 53154

FACILITY QUARTERLY REPORT

[X] 1. March 31 [ ] 3. Sept. 30
[ ] 2. June 30 [ ] 4. Dec. 31

1,9,8,4

Please read the attached instructions, and provide all applicable information on both sides of this form. This form must be completed, signed, and returned to the appropriate district office within 30 days. All answers on this page MUST BE IN POUNDS.

	A. IGNITABLES (pounds)	B. HALOGENATED SOLVENTS AND TOXIC SOLVENTS (pounds)	C. HEAVY METALS (pounds)	D. TOXIC WASTES OTHER THAN THOSE LISTED IN B & C (pounds)	E. CORROSIVES (pounds)	F. REACTIVES (pounds)	G. ACUTE H.W., TOXIC PRODUCTS AND INTERMEDIATES (pounds)	TOTALS
1. Amount of hazardous waste on-site at beginning of the reporting period.	13310	8470	N/A	9680	32695	N/A	N/A	64155
2. Amount of hazardous waste generated on-site during the reporting period.	51425	19965	N/A	1815	96745	N/A	N/A	169950
3. Amount of hazardous waste received from other facilities during the reporting period. (List facilities on Page 2.)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4. Total. Add lines 1, 2, and 3 for each column.	64735	28435	N/A	11495	129440	N/A	N/A	234105
5. Amount of hazardous waste shipped off-site during the reporting period. (List transporters used on Page 2.)	40793	15012	N/A	1001	73538	N/A	N/A	130344
6. Amount of hazardous waste recycled on-site during the reporting period.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7. Total amount of hazardous waste that was treated on-site during the reporting period.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
a. Amount of hazardous waste treated by treatment code T ___ ___	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
b. Amount of hazardous waste treated by treatment code T ___ ___	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
c. Amount of hazardous waste treated by treatment code T ___ ___	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8. Total amount of hazardous waste disposed on-site during the reporting period.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
a. Amount of hazardous waste disposed by disposal code D ___ ___	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
b. Amount of hazardous waste disposed by disposal code D ___ ___	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
9. Amount of hazardous waste still on-site at end of the reporting period.	23942	13423	N/A	10494	55902	N/A	N/A	103761

Page one

FACILITY NAME	EPA I.D. NUMBER	CITY	STATE
(1) None			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
(10)			

5. Transporters used to ship hazardous waste. (List transporters.) Attach additional sheet if needed.

TRANSPORTER NAME	EPA I.D. NUMBER	CITY	STATE
(1) Waste Research & Reclamation	WID990829475	EauClaire	Wis.
(2) Phillip A. Hunt Chemical Co.	ILT053218251	Rolling Meadows	Ill
(3) Chemical Services	ILD980701106	Crestwood	Ill
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
(10)			

I certify under penalty of law, that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name (Print or type)

Paul H. Luchtefeld, Assistant Superintendent Environmental Engineering

Signature and Title

Date Signed

5/29/87

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 8 | 0 | 6 | 8 | 6 | 9 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

ARD 069748192

X. FACILITY'S NAME (specify) | E | N | S | C | O | | I | N | C | | FACILITY'S EPA ID NUMBER | A | R | D | 0 | 6 | 9 | 7 | 4 | 8 | 1 | 9 | 2 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | A | M | E | R | I | C | A | N | | R | O | A | D |

City or Town | E | L | D | O | R | A | D | O | | State | A | R | Zip | 7 | 1 | 7 | 3 | 0 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Oil with low levels PCB, but	0 1	D 0 0 3	6	P * (T)
2	greater than 500 PPM				P * T
3					P * T
4					P * T
5					P * T
6					P * T
7					P * T
8					P * T

XIII. COMMENTS (enter information by line number -- see instructions)

MAY BE PHOTOCOPIED

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 1983

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I N D 0 0 0 8 0 6 8 4 4

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

ILD 062480850

X. FACILITY'S NAME (specify) | C P I N O R G A N I C S

FACILITY'S EPA ID NUMBER | I L D 0 6 2 4 8 0 8 5 0

XI. FACILITY'S ADDRESS

Street or P. O. Box | I N D U S T R Y A V E N U E

City or Town | D E L P H I | State | | Zip | 6 0 4 3 5

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Waste Cupric Chloride	0 8	D 0 0 2	4 4 2	P (T)
2					P T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 8 | 0 | 6 | 8 | 4 | 4 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

IND064703200

X. FACILITY'S NAME (specify) | E | N | V | I | R | O | N | M | E | N | T | A | L | | W | A | S | T | E | | C | O | N | T | R | O | L | | | | FACILITY'S EPA ID NUMBER | I | N | D | 0 | 0 | 7 | 8 | 0 | 5 | 4 | 4 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | R | R. | #4 | | | |

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER I N D 0 0 0 8 0 6 8 4 4

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

INT190010397

X. FACILITY'S NAME (specify.) ADAMS CENTER LANDFILL

FACILITY'S EPA ID NUMBER I N D 0 7 8 9 1 1 1 4 6

XI. FACILITY'S ADDRESS

Street or P. O. Box 4636 ADAMS CENTER ROAD

City or Town FORT WAYNE State IN Zip 46809

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (use code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF MEASURE (circle one)
1	Hydroxide Sludge	0 1 8	D 0 0 6	1 4 8	P * * (T)
2	Hazardous Waste Solid NOS (Sand	0 1 8	D 0 0 8	4 0	P * * (T)
3	Blasting Sand)				P * * T
4					P * * T
5					P * * T
6					P * * T
7					P * * T
8					P * * T

XIII. COMMENTS (enter information by line number -- see instructions)

MAY BE PHOTOCOPIED

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 0 | 8 | 0 | 6 | 8 | 4 | 4 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

OKD070641412

X. FACILITY'S NAME (specify) | Q | H | 4 | Q | R | E | S | S | C | H | E | M | I | C | A | L | C | O | M | P | A | N | Y | FACILITY'S EPA ID NUMBER | O | K | D | 0 | 7 | 0 | 6 | 4 | 1 | 4 | 1 | 2 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | M | A | I | N | S | T | R | E | E | T |

City or Town | C | A | R | D | O | N | State | O | K | Zip | 7 | 4 | 3 | 3 | 9 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Waste Copper Sulfate	1 5	D 0 0 2	2 4 9	P * (T)
2					P * T
3					P * T
4					P * T
5					P * T
6					P * T
7					P * T
8					P * T

XIII. COMMENTS (enter information by line number -- see instructions)

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 0 | 6 | 8 | 0 | 5 | 0 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year. OHD083377010

X. FACILITY'S NAME (specify) | M | U | N | I | C | I | P | A | L | | S | E | W | E | R | | D | I | S | T | R | I | C | T | | | | | | FACILITY'S EPA ID NUMBER | O | H | D | 0 | 0 | 0 | 7 | 2 | 0 | 2 | 9 | 0 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 1 | 6 | 0 | 0 | | G | U | E | S | T | | S | T | R | E | E | T | | | | | |

Division of Land Pollution Control
INDIANA STATE COARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 8 | 0 | 5 | 0 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

MID098011992

X. FACILITY'S NAME (specify) | N | E | L | S | O | N | | I | N | D | U | S | T | R | I | A | L | | S | E | R | V | I | C | E | S | | | | | FACILITY'S EPA ID NUMBER | M | I | D | 0 | 9 | 8 | 0 | 1 | 1 | 9 | 9 | 2 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 1 | 2 | 3 | 4 | 5 | | S | C | H | A | E | F | E | R | | H | I | G | H | W | A | Y | | | | | | | | | | | | | | |

City or Town | D | E | T | R | O | I | T | | | | | | | | | | | | | | | | State | M | I | Zip | 4 | 8 | 2 | 2 | 7 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Cyanide Waste	1 7	F 0 0 9	5	P (T)
2					P T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

MAY BE PHOTOCOPIED

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE of INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 0 | 6 | 8 | 0 | 5 | 0 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

IND040295347

X. FACILITY'S NAME (specify) | V | A | N | | W | A | T | E | R | S | | A | N | D | | R | O | G | E | R | S | | | | | | | | | | | FACILITY'S EPA ID NUMBER | I | N | D | 0 | 0 | 4 | 0 | 2 | 9 | 5 | 3 | 4 | 7 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 7 | 4 | 2 | 9 | | E | 30t | h | | S | T | R | E | E | T | | | | | | | | | | | | | | | |

City or Town | I | N | D | I | A | N | A | P | O | L | I | S | | | | | | | | | | State | I | N | Zip | 4 | 6 | 2 | 1 | 9 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Waste Solvents	1 5	F 0 0 3 F 0 0 1	1 6	P (T)
2					P T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

MAY BE PHOTOCOPIED

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 0 | 6 | 8 | 0 | 5 | 0 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

ILT000646810
ILD069506160

X. FACILITY'S NAME (specify) | A | M | E | R | I | C | A | N | | C | H | E | M | I | C | A | L | | S | E | R | V | I | C | E | S | | | | | FACILITY'S EPA ID NUMBER | I | N | D | 0 | 0 | 1 | 6 | 3 | 6 | 0 | 2 | 6 | 5 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 4 | 2 | 0 | | S | O | U | T | H | | C | O | L | F | A | X | | A | V | E | N | U | E | | | | | | | | | | | | | |

City or Town | G | R | I | F | F | I | T | H | | | | | | | | | | | | State | I | N | Zip | 4 | 6 | 9 | 1 | 3 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Waste Flammable Liquid NOS	0 8	F 0 0 3	4 6 5	P (T)
2	Waste 1-1-1 Trichloroethane	1 5	F 0 0 1	1 8	P (T)
3	Waste Trichloroethylene	1 5	F 0 0 1	1 5	P (T)
4	Waste Hazardous Liquid, NOS	1 5	F 0 0 1 F 0 0 3	2	P (T)
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

MAY BE PHOTOCOPIED

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 0 | 6 | 8 | 0 | 5 | 0 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

IND064703200

X. FACILITY'S NAME (specify) | E | N | V | I | R | O | N | M | E | N | T | A | L | | W | A | S | T | E | | C | O | N | T | R | O | L | | | | FACILITY'S EPA ID NUMBER | I | N | D | 0 | 0 | 0 | 7 | 8 | 0 | 5 | 4 | 4 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | R. | R. | #4 |

City or Town | R | O | C | H | E | S | T | E | R | State | I | N | Zip | 4 | 6 | 9 | 7 | 5 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Hydroxide Sludge	1 5	F 0 0 6	1 3 0 4	P T
2					P T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

MAY BE PHOTOCOPIED

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 0 | 0 | 6 | 0 | 6 | 8 | 0 | 5 | 0 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

IND006044333

X. FACILITY'S NAME (specify) | E | N | V | I | R | O | N | M | E | N | T | A | L | | P | R | O | C | E | S | S | | S | E | R | V | I | C | E | S |

FACILITY'S EPA ID NUMBER | O | H | D | 0 | 0 | 1 | 0 | 6 | 0 | 8 | 5 | 8 | 8 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 1 | 2 | 8 | 8 | | M | I | C | H | I | G | A | N | | A | V | E | N | U | E |

City or Town | D | A | N | V | I | L | L | E | | |

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE -- INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER I|N|D|0|0|6|0|6|8|0|5|0

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

INT190010397
ILD069506160

X. FACILITY'S NAME (specify) ADAMS CENTER LANDFILL FACILITY'S EPA ID NUMBER I|N|D|0|7|8|9|1|1|4|6

XI. FACILITY'S ADDRESS

Street or P. O. Box 4636 ADAMS CENTER ROAD

City or Town FORT WAYNE State IN Zip 46806

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Lead Contaminated Sand	1 5	D 0 0 8	20	P (T)
2	Hydroxide Sludge	1 5	F 0 0 6	1377	P (T)
3	Waste Oil	0 1	D 0 0 1	10	P (T)
4	Hazardous Waste Solid NOS (Sand	1 5	D 0 0 8	51	P (T)
5	Blasting Sand)				P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

FEB 28 1984

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/AC

F	O	H	D	0	0	1	8	8	0	4	4	2	1
1	2										13	14	15

II. NAME OF INSTALLATION

| G | M | C | | N | E | W | | D | E | P | A | R | T | U | R | E | | H | Y | A | T | T | | | | | | | | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

G O H D 0 0 1 8 9 0 4 4 3 121

IX. FACILITY'S EPA I.D. NO.

M I D 0 5 7 0 0 2 6 0 2

X. FACILITY NAME

ENVIRONMENTAL WASTE CONTROL, INC

XI. FACILITY'S ADDRESS

27140 PRINCETON AVENUE

Street or P.O. Box

INKSTER MI 48141

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Freon Solvent	01	F001	3039	P
2	Paint Thinner	01	F005	3222	P
3	Chromium Sludge	12	D007	1653	P
4	Caustic (Varnish Stripper)	02	D002	1030	P
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Page _____ of _____

JUN 2 4 1985
Due 3-1-84

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T AC

F O H D 0 2 0 6 3 2 9 9 8 1 1
1 2 11 14 15

II. NAME OF INSTALLATION

G M I C G M I A S E M B L Y D I V L O R D S T O W N P L A N T
30 47

III. INSTALLATION MAILING ADDRESS

3 P O B O X 1 4 0 6
15 16 45
Street or P.O. Box

4 W A R R E N O H 4 4 8 2
15 16 41 42 47 51
City or Town State Zip Code

IV. LOCATION OF INSTALLATION

5 2 3 0 0 H A L L O C K Y O U N G R O A D
15 16 45

7 8
47 48
County Code

6 W A R R E N O H 4 4 8 2 3 7 1 1
15 16 41 42 47 51 53 56
City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

2 S T I G E R R A Y M O N D
15 16 45

2 1 6 - 8 4 1 - 5 5 1 3
46 55
Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year)

Chemical Recovery Systems, Incorporated	MID 060975844
S.C.A. of Ohio	OHD 086665239
ENVIRCO	OHD 045710598
BFI of Michigan	MID 053335899
St. Joseph Motor Lines	CAD 042097261

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. C. Abernethy — Plant Manager — [signature] — 3-1-84

Print/Type Name | Title | Signature of Authorized Representative | Date Signed

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

Specify facility to which all wastes on this page were sent

VIII. GENERATOR'S EPA I.D. NO.

TAC

OHD021063299812

IX. FACILITY'S EPA I.D. NO.

OHD045243706

X. FACILITY NAME

FONDESSY ENTERPRISES INC

XI. FACILITY'S ADDRESS

876 OTTER CREEK ROAD

Street or P.O. Box

OREGON OH 43616

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste paint sludge	12	F006	15219	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (Enter information for various items)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

Specify facility to which all wastes on this page were sent

VIII. GENERATOR'S EPA I.D. NO.

T AC

G O H D 0 2 0 6 3 2 9 9 8 2

IX. FACILITY'S EPA I.D. NO.

M I D 0 6 0 9 7 5 8 4 4

X. FACILITY NAME

C H E M I C A L R E C O V E R Y S Y S T E M S

XI. FACILITY'S ADDRESS

3 6 3 4 5 V A N B O R N R D

Street or P.O. Box

R O M U L U S M I 4 8 1 7 4

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste thinner from painting operations	07	D001	406	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS enter information by section and code

102,800 gal. x $\frac{7.9 \text{ lbs}}{\text{gal}}$ x $\frac{1T}{2000 \text{ lbs}}$ = 406 tons

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

specify facility to which all wastes on this page were sent

VIII. GENERATOR'S EPA I.D. NO.

C O H D 0 2 0 6 3 2 9 9 8 (12) TAC

IX. FACILITY'S EPA I.D. NO.

O H D 0 0 1 9 2 6 7 4 0

X. FACILITY NAME

H U K I L L C H E M I C A L C O R P

XI. FACILITY'S ADDRESS

7 0 1 3 K R I C K R O A D

Street or P.O. Box

B E D F O R D O H 4 4 1 4 6

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste thinner from painting operations	0 7	D 0 0 1	13618	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS enter information for a given item number

93,050 gal x $\frac{7.9 \text{ lbs}}{\text{gal}}$ x $\frac{1 \text{ T}}{2000 \text{ lbs}}$ = 368 T

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the Calendar year ending December 31, 19 83

FACILITY INFORMATION

Specify facility to which all wastes on this page were sent.

VIII. GENERATOR'S EPA I.D. NO.

1-2	3-10	11-14	15
OHD	0210633299	8	12

IX. FACILITY'S EPA I.D. NO.

16-17	18-27
MID	0480906333

X. FACILITY NAME

WAYNE DISPOSAL CO

XI. FACILITY'S ADDRESS

4950 N. SERVICE DR

Street or P.O. Box

BELLEVILLE MI 48111

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste treatment sludge from electroplating	12	F010 16	13514	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (Enter information for any item number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C|O|H|D|0|2|0|6|3|2|9|9|8| |2|
1 2 13 14 15

IX. FACILITY'S EPA I.D. NO.

A|L|D|0|0|0|6|2|2|4|6|4|
16 27

X. FACILITY NAME

C|H|E|M|I|C|A|L| |W|A|S|T|E| |M|A|N|A|G|E|M|E|N|T| |I|N|C|
28 59

XI. FACILITY'S ADDRESS

P|O| |B|O|X| |5|5|
28

Street or P.O. Box

E|M|E|L|L|E|
28

City or Town

A|L|3|5|4|5|9|

State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste Flammable liquid	07	D001	16150	P
2	Waste hazardous solid	12	D008	6848	P
3	Waste flammable solid	08	D008	15072	P
4	Waste flammable solid	08	D001	11050	P
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(Specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T AC

G O H D 0 2 0 6 3 2 9 9 8 2

IX. FACILITY'S EPA I.D. NO.

T N D 9 8 0 7 2 9 3 0 5

X. FACILITY NAME

A M E R I C A N I N D U S T R I A L W A S T E

XI. FACILITY'S ADDRESS

I N D U S T R I A L D R I V E

Street or P.O. Box

W H I T E B L U F F T N 3 7 1 8 7

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	PCB Capacitors	1 2	U N 2 3 1 5 4	9 1 0 1 7	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (Enter information by section and item no.)

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-84

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
GENERATOR ANNUAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other_____

II. GENERATOR'S EPA I.D. NUMBER

T A C

(1 2) K S D 0 0 7 1 4 5 9 9 7 (13 14 15) T 1

CJ03 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

(30) G M C DE L CO RE MY DIV OL AT HE (49)

IV. INSTALLATION MAILING ADDRESS

(15 16) 3 4 0 0 W D E N N I S A V E N U E (43)

Street or P.O. Box

(15 16) 4 O L A T H E (41 42) K S (47) 6 6 0 6 1 (51)

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

(15 16) 5 (45)

Street or Route number

(15 16) 6 (41 42) (47) (51)

City or Town State Zip Code

VI. INSTALLATION CONTACT

(15 16) 2 M A R S H A L L R O B E R T (45)

Name (last and first)

(46) 9 1 3 - 7 9 1 1 - 6 6 0 0 (55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

O. D. Nelson PLANT MANAGER O D Nelson 2/27/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(3-80) (Revised 11-83)

Page 1 of 6

Do not make entries in shaded areas

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Generator ANNUAL Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

K S D 0 0 7 1 4 5 9 0 7 T/A C T T

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SCHOYLKILL METAL CORP.

X. FACILITY'S EPA I.D. NO.

L A D 0 0 8 1 8 8 1 6 7

XI. FACILITY ADDRESS

Brooklon Dr. Box 73916
Baton Rouge, La. 70807

XII. TRANSPORTATION SERVICES USED

ATSF Railroad ILD 006928543 Ashland Chemical Co. KSD057889313
USPCI OKT 410010466 McKesson Chemical MOD007158157
GOULD, INC. NED006451033

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Emission Control Dust from Secondary Lead Smelting		K 0 6 9	1 0 2 3 8	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Page 2 of 6

Do not make entries in shaded areas

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Generator ANNUAL Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

K S D 0 0 7 1 4 5 9 0 7

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Gould, Inc. Metal Division

X. FACILITY'S EPA I.D. NO.

M E D 0 0 6 5 4 1 0 3 3

XI. FACILITY ADDRESS

South 5 th Street
Frisco, Tx. 75030

XII. TRANSPORTATION SERVICES USED

See Page 2

XIII. WASTE IDENTIFICATION

Sequence #	Haz. Waste	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1		Emission Control Dust from Secondary Lead Smelting	1 5	K 0 6 9	2 5 4 0 7	P
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Generator ANNUAL Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

C K S D 0 0 7 1 4 5 2 0 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

USPCI
Lone Mountain Surface Disposal

X. FACILITY'S EPA I.D. NO.

F O K D 0 6 5 4 3 8 3 7 6

XI. FACILITY ADDRESS

R.R. #2
Box 180- A
Waynoka, Ok 73860

XII. TRANSPORTATION SERVICES USED

See Page 2

XIII. WASTE IDENTIFICATION

Sequence #	Haz. Waste	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Units of Measure
1		Lead Bearing Sludge from Wastewater Treatment	1 5	D 0 0 8	4 0 8 7 0	P
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Generator ANNUAL Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

K S D 0 0 7 1 4 5 9 0 7 T A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

McKESSON CHEMICAL

X. FACILITY'S EPA I.D. NO.

F M O D O O 7 1 5 8 4 5 7

XI. FACILITY ADDRESS

2000 Guniotte
Kansas City, Mo. 64120

XII. TRANSPORTATION SERVICES USED

See page 2

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	D.O.T. Hazard Table	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Mehylene Chloride	1, 3	U 0 2 4	2 8 0 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Generator ANNUAL Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

KS D 0 0 7 1 4 5 9 0 7 T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

WASTE RESEARCH & RECLAIM

X. FACILITY'S EPA I.D. NO.

FMID 9 9 0 8 2 9 4 7 9

XI. FACILITY ADDRESS

Route 7
Eau Claire, Wi. 54701

XII. TRANSPORTATION SERVICES USED

See page 2

XIII. WASTE IDENTIFICATION

Sequence No.	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Waste Methylene Chloride	1	F 0 0 2	6 6 0 0	P
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 3

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, PLANT 3

STREET 56 CLYDE AVENUE

CITY BUFFALO STATE NY ZIP CODE 14215

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. N/A

NAME CPW DISPOSAL LTD.

STREET RR #3 SNOW VALLEY ROAD

CITY BARRIE STATE ONTARIO, CANADA ZIP CODE L4M4S5

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Flammable Liquid NOS	[redacted]	[redacted]	[redacted]	1,1,1,1,0	0,1	0,2
Non-Halogenated Solvents						
Flammable Liquid NOS	[redacted]	[redacted]	[redacted]	1,1,1,6,5	0,1	0,2
Cement Adhesive						

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(13) PRINT OR TYPE NAME T.B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE William A Hunt for T. Guthrie DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 3

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, PLANT 3

STREET 56 CLYDE AVENUE

CITY BUFFALO STATE NY ZIP CODE 14215

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [redacted]

NAME CECOS INTERNATIONAL

STREET NIAGARA FALLS BOULEVARD & 56TH STREET

CITY NIAGARA FALLS STATE NY ZIP CODE 14302

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Corrosive Liquid NOS	[redacted]	[redacted]	[redacted] 19	1 1 5 0 0 0	0 1 2	0 1 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(13) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE [signature] for T. GUTHRIE DATE 3/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 3 of 3

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [X] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, PLANT 3
STREET 56 CLYDE AVENUE
CITY BUFFALO STATE NY ZIP CODE 14215

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [redacted]
NAME FRONTENAC ENVIRONMENTAL SERVICES INC.
STREET 3163 BUFFALO AVENUE
CITY NIAGARA FALLS STATE NY ZIP CODE 14303

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste 111 Trichlorethane	101017	01	S02	004210	01	012
Flammable Liquid, NOS, Cement Adhesive	101013	03	S02	001615	01	012

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. GUTHRIE
TITLE Director of Manufacturing Engineering
SIGNATURE T B Guthrie for T Guthrie DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 2

(2) ☐ GENERATOR EPA ID NUMBER [redacted] OR ■ SMALL GENERATOR ■ EXEMPT GENERATOR

NAME

STREET

CITY STATE ZIP CODE

(3) ☒ TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME HARRISON RADIATOR DIVISION, GMC

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No.

NAME HARRISON RADIATOR DIVISION, GMC

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Solid	0119	04	S03	18961	04	
NOS Wastewater Treatment Sludge	0108	1				
Hazardous Waste Solid NOS						
Sludge Laden Rotary Vacuum Curtain	0108	04	S03	150	03	

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T. B. Guthrie DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 2

(2) ☐ GENERATOR EPA ID NUMBER [redacted] OR ■ SMALL GENERATOR ■ EXEMPT GENERATOR

NAME
STREET
CITY STATE ZIP CODE

(3) ☒ TRANSPORTER EPA ID NUMBER [redacted]512 NYSDEC Part 364 Permit No. SA-10151

NAME HARRISON RADIATOR DIVISION, GMC
STREET 200 UPPER MOUNTAIN ROAD
CITY LOCKPORT STATE NY ZIP CODE 14094

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [redacted]

NAME NEWCO WASTE SYSTEMS
STREET 4626 ROYAL AVENUE
CITY NIAGARA FALLS STATE NY ZIP CODE 14303

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Asbestos and Asbestos Gasket	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
NOS, Non-Hazardous	9 9 1 9 1 7	0 2	8 1 9 1 0	1 1 1 8 1 8 1 0	0 1 3	0 1 2
	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T.B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T B Guthrie for T Guthrie DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 3

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC PLANT 1

STREET 160 WASHBURN STREET

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. N/A

NAME CPW DISPOSAL LTD.

STREET RR #3 SNOW VALLEY ROAD

CITY BARRIE STATE ONTARIO, CANADA ZIP CODE L4M4S5

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Trichloroethylene	[redacted]	[redacted]	[redacted]	1,123,715	011	012
Hazardous Waste Solid, NOS, Contaminated Solder Dross	[redacted]	[redacted]	[redacted]	1,212,010	011	012
Hazardous Waste Liquid, NOS, Waste Brulin and Copper Wax	[redacted]	[redacted]	[redacted]	15,515	011	012
Corrosive Liquid, NOS, Floor Stripper & Copper Wax	[redacted]	[redacted]	[redacted]	15,515	011	012
Flammable Liquid, NOS, Mineral Spirits	[redacted]	[redacted]	[redacted]	13,310	011	012

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. GUTHRIE

TITLE Director of Manufacturing Engineering

SIGNATURE William A Hunt for TBG 2/20/84

DATE

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 3

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, PLANT 1

STREET 160 WASHBURN STREET

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [redacted]

NAME CECOS INTERNATIONAL

STREET NIAGARA FALLS BOULEVARD & 56TH STREET

CITY NIAGARA FALLS STATE NY ZIP CODE 14302

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Solids NOS	[redacted]	[redacted]	[redacted]	1,150	01	02
Contaminated Solder Dross						
Corrosive Liquid NOS						
Floor Stripper & Copper Wax				1515	01	02
Hazardous Waste Liquid NOS						
Waste Brulin & Copper Wax				1515	01	02
PCB Capacitors				1515	01	02

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE William A. Kunde for T.B. GUTHRIE DATE 2/20/84

47-15-L7 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 3 of 3

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, PLANT 1

STREET 160 WASHBURN STREET

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] 0 8 2 6 4 6 6 NYSDEC Facility I.D. No. [redacted]

NAME FRONTENAC ENVIRONMENTAL SERVICES

STREET 3163 BUFFALO AVENUE

CITY NIAGARA FALLS STATE NY ZIP CODE 14303

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Trichloroethylene	0 0 1	0 1	T 1 4	6 6 0	0 1	0 2
Flammable Liquid NOS Non-Halogenated Solvents	0 0 3	0 1	T 1 4	2 2 0	0 1	0 2
Waste Paint	0 0 1	0 1	T 1 4	2 2 0	0 1	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law

(12) PRINT OR TYPE NAME T.B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE William A Kwast For T. Guthrie DATE 2/24/84

47-15-17 (12/81) ADDENDUM

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 9 of 9

(2) [X] GENERATOR EPA ID NUMBER N Y D 0 0 2 1 2 6 8 5 2 OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME Harrison Radiator Division, GMC, Wastewater Treatment Plant

STREET 200 Upper Mountain Road

CITY Lockport STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER N Y D 9 8 0 5 9 2 9 0 1 NYSDEC Facility I.D. No.

NAME Harrison Radiator Division, GMC, Wastewater Treatment Plant

STREET 5707 Upper Mountain Road

CITY Lockport STATE NY ZIP CODE 14094

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Liquid, NOS	F 0 1 9	0 1	T 2 3	1 1 9 0 x 1 0 6	0 1	0 2
Untreated Process Wastewater	D 0 0 8					
Same as above	F 0 1 9	0 1	T 2 4	1 1 9 0 x 1 0 6	0 1	0 2
	D 0 0 8					
Same as above	F 0 1 9	0 1	T 2 9	1 1 9 0 x 1 0 6	0 1	0 2
	D 0 0 8					
Same as above	F 0 1 9	0 1	T 3 1	1 1 9 0 x 1 0 6	0 1	0 2
	D 0 0 8					
Same as above	F 0 1 9	0 1	T 3 6	1 1 9 0 x 1 0 6	0 1	0 2
	D 0 0 8					
Same as above	F 0 1 9	0 1	T 3 7	1 1 9 0 x 1 0 6	0 1	0 2
	D 0 0 8					
Same as above	F 0 1 9	0 1	T 4 0	1 1 9 0 x 1 0 6	0 1	0 2
	D 0 0 8					
Same as above	F 0 1 9	0 1	T 4 1	1 1 9 0 x 1 0 6	0 1	0 2
	D 0 0 8					

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE William A Kirsch for T. B. Guthrie DATE 3/22/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 5

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 5707 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] - [ ]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [ ]

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Solid, NOS, Wastewater Treatment Sludge	0 1 7 9 0 1 0 1 8	0 4	5 0 3	1 8 9 6 1	0 4	0 2
Hazardous Waste Solid NOS Sludge Laden Rotary Vacuum Curtain	0 1 0 1 8	0 4	5 0 3	1 5 0	0 3	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T.B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T. B. Guthrie for T. GUTHRIE DATE 2/20/84

47 (5-17 (12/83))

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 5

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. N/A

NAME MICHIGAN DISPOSAL INC.

STREET 49350 N. SERVICE DRIVE

CITY BELLEVILLE STATE MICHIGAN ZIP CODE 48111

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Liquid NOS	0 1 0 1 0 1 8	0 1	T 2 1 1	1 1 3 0 0 1	0 1	0 2
Waste Water Contaminated with						
Perchloroethylene						
Hazardous Waste Liquid NOS	0 1 0 1 0 1 8	0 1	D 8 1 1	1 1 3 0 0 1	0 1	0 2
Waste Water Contaminated with						
Perchloroethylene						

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T. B. Guthrie per T. B. GUTHRIE DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 3 of 5

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WASTEWATER TREATMENT PLANT
STREET 5507 UPPER MOUNTAIN ROAD
CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. N/A

NAME CALCON CORPORATION
STREET NEVILLE ISLAND FACILITY
CITY PITTSBURGH STATE PA ZIP CODE 15230

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Solid NOS	0 0 1 2	0 2	T 1 0	1 4 1 5 3 0	0 3	0 2
Act. Carbon Containing Perchloroethylen						

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(13) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T B Guthrie for T Guthrie DATE 3/30/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 4 of 5

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WASTEWATER TREATMENT PLANT

STREET 5507 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. [redacted]

NAME CPW DISPOSAL LTD.

STREET RR #3 SNOW VALLEY ROAD

CITY BARRIE STATE ONTARIO, CANADA ZIP CODE L4M4S5

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Solid NOS	0 1 0 1 8	0 1 2	S 1 1 4	1 1 1 3 8 5	0 1	0 2
Antracite Coal Filter Media						

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. Guthrie TITLE Director of Manufacturing Engineering

SIGNATURE T. B. Guthrie DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 5 of 5

(2) [X] GENERATOR EPA ID NUMBER [redacted] 0 1 OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME: HARRISON RADIATOR DIVISION, GMC, WASTEWATER TREATMENT PLANT

STREET: 5507 UPPER MOUNTAIN ROAD

CITY: LOCKPORT | STATE: NY | ZIP CODE: 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [ ] - [ ]

NAME:

STREET:

CITY: | STATE: | ZIP CODE:

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. N/A

NAME: STEETLEY INDUSTRIES LTD.

STREET: RR # 2

CITY: DUNDAS | STATE: ONTARIO, CANADA | ZIP CODE: L9H1E2

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Solid, NOS	0 1 0 1 0 1 8	0 1 2	D 1 9 1 3	1 1 1 1 1 1 1 1 1 9 1 1	0 1 4	0 1 2
Anthracite Coal Filter Media						

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME: T. B. GUTHRIE | TITLE: Director of Manufacturing Engineering

SIGNATURE: T. B. Guthrie FOR T. GUTHRIE | DATE: 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 1 of 8

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. N/A

NAME CPW DISPOSAL LTD.

STREET RR #3 SNOW VALLEY ROAD

CITY BARRIE STATE ONTARIO, CANADA ZIP CODE L4M4S5

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Trichloethylene	[redacted]	01	S14	12340	01	02
Waste Tetrachloroethylene	0101	01	S14	8745	01	02
Hazardous Liquid, NOS, Degreaser Rinse Water	0101	01	S14	2210	01	02
Waste Paint	0101	01	S14	3135	01	02
Hazardous Waste Liquid, NOS, (Vinyl Tolvene Resin)	0101	01	S14	165	01	02
Waste Petroleum Distillates	0101	01	S14	55	01	02
Flammable Liquid, NOS, Mineral Spirits	0101	01	S14	550	01	02
Hazardous Waste Solid, NOS, (Naptha & Speedi-dry)	0101	02	S14	275	01	02
Hazardous Waste Solid, NOS, (Flux in speedi-dry)	0102	02	S14	275	01	02
Hazardous Waste Solid, NOS, (Chlorineted Solvent in Speedi-dry)	0101	02	S14	385	01	02

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(13) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T. B. Guthrie DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 8

(2) ☒ GENERATOR EPA ID NUMBER [redacted] OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) ☐ TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. N/A

NAME CPW DISPOSAL LTD.

STREET RR #3 SNOW VALLEY ROAD

CITY BARRIE STATE ONTARIO, CANADA ZIP CODE L4M4S5

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Solid, NOS, (Solder Dross)	0 0 1 8	0 1 2	S 1 1 4	2 7 5	0 1	0 1 2
Hazardous Waste Solid, NOS, (Trichloethylene and Speedi-dry)	0 0 1	0 1 2	S 1 1 4	1 1 0	0 1	0 1 2
Hazardous Waste Solid, NOS (Perchcoethylene & Speedi-dry)	0 0 1	0 1 2	S 1 1 4	1 6 5	0 1	0 1 2
Hazardous Waste Solid, NOS, (Paint & Speedi-dry)	0 0 1	0 1 2	S 1 1 4	1 6 5	0 1	0 1 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(13) PRINT OR TYPE NAME T.B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T.B. Guthrie for T. GUTHRIE DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No 3 of 8

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No N/A

NAME SCANDEX CHEMICAL SERVICES

STREET 29 TRILLIUM PARK PLACE

CITY KITCHNER STATE ONTARIO, CANADA ZIP CODE N2E1X1

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Haxardous Waste Liquid, NOS (Degreaser Rinse Water)	0101	01	T81	7637	01	02

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T.B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T.B. Guthrie for T. GUTHRIE DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 4 of 8

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No. 9 2 1 5 1 6 1 9

NAME ENVIROTEK

STREET 4000 RIVER ROAD

CITY TONAWANDA STATE NY ZIP CODE

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Liquid, NOS,						
(Waste Brulin)	1 0 1 0 2	0 1	T 6 3	1 3 8 5	0 1	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T.B. GUTHRIE

TITLE Director of Manufacturing Engineering

SIGNATURE [signature] for T. GUTHRIE DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 5 of 8

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No.

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No.

NAME CECOS INTERNATIONAL

STREET NIAGARA FALLS BOULEVARD & 56TH STREET

CITY NIAGARA FALLS STATE NY ZIP CODE 14302

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Flammable Liquid NOS	0101	01	T129	9000	01	02
Flammable Liquid NOS (Non-Halogenated Solvents)	0101	01	S101	1110	01	02
Waste Paint	0101	01	S101	3855	01	02
Hazardous Waste Liquid, NOS, Waste Brulin	0102	01	S101	1655	01	02
Waste Petroleum Distillates	0101	01	S101	1655	01	02
Hazardous Waste Liquid, NOS, (Waste Chelant Solution)	0102	01	T129	2110	01	02
PCB Capacitors	0107	02	S071	2120	01	02
Hazardous Waste Liquid NOS	0108	01	T129	19612	01	02

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T. B. Guthrie for T. GUTHRIE DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No 6 of 8

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME
STREET
CITY STATE ZIP CODE

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No [ ] – [ ]

NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No N/A

NAME WAYNE DISPOSAL
STREET 49350 N. SERVICE ROAD
CITY BELLEVILLE STATE MICHIGAN ZIP CODE 48111

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Liquid, NOS	001	01	T21	5811	01	02
Tetrachloroethylene Contaminated	008					
Wastewater						
Hazardous Waste Liquid, NOS	001		D81	5811	01	02
Tetrachloroethylene Contaminated	008					
Wastewater						

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T B Guthrie for T. GUTHRIE DATE 2/20/84

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 7 of 8

(2) [X] GENERATOR EPA ID NUMBER [redacted]5|2| OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted]9|8|3|6|5|7|9| NYSDEC Facility I.D. No. [redacted]

NAME SCA CHEMICAL SERVICES INC.

STREET 1550 BALMER ROAD

CITY MODEL CITY STATE NY ZIP CODE 14107

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Hazardous Waste Solid NOS	1 0 1 0 1 6	0 1 4	D 8 1 1	1 1 1 6 1 1 6 1 0	0 1 3	0 1 2
Solid Separator Sludge	1 0 1 1 1 9	1	1	1	1	1
	1	1	1	1	1	1
Hazardous Waste Solid NOS	1 0 1 1 1 9	0 1 4	D 8 1 1	1 1 1 1 0 1 5 1 7	0 1 4	0 1 2
Wastewater Treatment Sludge	1 0 1 0 1 8	1	1	1	1	1
	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T. B. GUTHRIE TITLE Director of Manufacturing Engineering

SIGNATURE T. B. Guthrie DATE 2/20/84

47 15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 8 of 8

(2) [X] GENERATOR EPA ID NUMBER [redacted] OR [ ] SMALL GENERATOR [ ] EXEMPT GENERATOR

NAME HARRISON RADIATOR DIVISION, GMC, WEST LOCKPORT COMPLEX

STREET 200 UPPER MOUNTAIN ROAD

CITY LOCKPORT STATE NY ZIP CODE 14094

(3) [ ] TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No.

NAME

STREET

CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)

EPA ID NUMBER [redacted] NYSDEC Facility I.D. No.

NAME FRONTENAC ENVIRONMENTAL SERVICES

STREET 3163 BUFFALO AVENUE

CITY NIAGARA FALLS STATE NY ZIP CODE 14303

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
Waste Trichloroethylene	U 2 3 0 1	0 1	S 1 4	3 7 1 2 5	0 1	0 2
Waste Tetrachloroethlene	U 2 1 0 1	0 1	S 1 4	8 8 0 0	0 1	0 2
Hazardous Waste Liquid NOS						
Wastewater containing Pechloroethylene	U 2 0 8	0 1	S 1 4	8 8 0	0 1	0 2
Waste Trichloroethylene						
Contaminated Charcoal	U 2 3 0 1	0 2	S 1 4	5 5 0	0 1	0 2
Flammable Liquid NOS						
Waste Paint	U 2 3 0 1	0 1	S 1 4	6 6 0	0 1	0 2
Flammable Liquid NOS						
(NAPTHA & Water)	U 2 3 0 1	0 1	S 1 4	1 1 6 5	0 1	0 2
Flammable Liquid NOS						
Non-Halogenated Solvent	U 2 3 0 1	0 1	S 1 4	3 8 5	0 1	0 2
Hazardous Waste Liquid NOS						
(Vinyl Tolvene Resin)	U 2 1 0 1	0 1	S 1 4	5 5	0 1	0 2
Hazardous Waste Liquid NOS						
(Waste Brulin)	U 2 1 0 1	0 1	S 1 4	3 3 0	0 1	0 2
Waste Formic Acid	U 1 2 3 0 1	S 1 4		1 1 0	0 1	0 2

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME T.B. GUTHRIE

TITLE Director of Manufacturing Engineering

SIGNATURE [signature] for T. GUTHRIE

DATE 2/20/84

JUL 05 RECD

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

(F) O H D 0 0 4 2 0 1 9 9 1 (1)

FAC

1 2 13 14 15

II. NAME OF INSTALLATION

GMC FISHER BODY DIV, ELYRIA PLANT

30 67

III. INSTALLATION MAILING ADDRESS

(3) PO BOX 4025

15 16 45

Street or P.O. Box

(4) ELYRIA OH 44036

15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF INSTALLATION

(5) 1400 LOWELL ST 47

15 16 45 47 48

County Code

(6) ELYRIA OH 44035 3714

15 16 41 42 47 51 53 56

City or Town State Zip Code Primary SIC Code

V. INSTALLATION CONTACT

(7) RANDALL LEWIS P. 216 - 329 - 1250

15 16 45 46 55

Name (last and first) Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED (list the name and EPA identification numbers of all hazardous waste transporters whose services were used)

METROPOLITAN ENVIRONMENTAL INT190010397
H. M. T. OHD980681670
ROSS TRANSPORTATION SERVICES OHD980614374
MET DRUM SERVICE NCD000603910
K&D INDUSTRIAL SERVICE MID072790710

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

R. M. BOWNES PLANT MANAGER [signature] 7/1/84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA 8010

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T AC

OHD 010 412 011 091 12

IX. FACILITY'S EPA I.D. NO.

OHD 048 456

X. FACILITY NAME

ROSS INCINERATION SERVICES INC

XI. FACILITY'S ADDRESS

3949 GILES RD

Street or P.O. Box

GRAFTON OH 44044

City or Town State Zip Code

XII. WASTE IDENTIFICATION

ITEM NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	IGNITABLE WASTE PAINT	01	D001	15,10	P
2	IGNITABLE WASTE SOLVENT	01	D001	11,80,19,18	P
3	IGNITABLE WASTE MOLD RELEASE	01	D001	4,115	P
4	IGNITABLE WASTE LIQUID CEMENT	01	D001	4,150	P
5	SPENT SOLVENT TRICHLOROETHYLENE	12	F001	1,780	P
6	STILL BOTTOM FROM SOLVENT RECOVERY III TRICHLOROETHANE	12	F002	4,263	P
7	OFF-SPEC, CONTAMINATED WASTE TOLUENE DIISOCYANATE, LIQUID	15	U223	1,936,12	P
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: __ _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify for city to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T AC

OHD004120119 1 2 11 12 15

IX. FACILITY'S EPA I.D. NO.

MID096963194 16 27

X. FACILITY NAME

CHEM-MET SERVICES 28 59

XI. FACILITY'S ADDRESS

18550 ALLEN RD 28

Street or P.O. Box

WYANDOTTE MI 48192

City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	EP TOXIC PAINT BOOTH SLUDGE CONTAINING CHROMIUM	12	D017	12075518	P
2	EP TOXIC RACK STRIP SLUDGE & FILTER CAKE CONTAINING CHROMIUM	12	D017	12426 1	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

Page 5 of 5

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: __ _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31 19 83

FACILITY INFORMATION

(specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T AC
OHD004201091 2
1 2 11 12 13

IX. FACILITY'S EPA I.D. NO.

OHD045243706
16 27

X. FACILITY NAME

FONDESSY ENTERPRISES INC
28 59

XI. FACILITY'S ADDRESS

876 OTTERCREEK RD
28
Street or P.O. Box

OREGON OH 43616
28
City or Town State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTEWATER TREATMENT SLUDGE FROM ELECTROPLATING OPER.	1 2	K 0 1 6	3 8 1 6	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
		25 26	27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52	53 54	55

XIII. COMMENTS (enter information by section number)

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code: _ _

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(specify for key to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T-AC

OHD004201091 2

IX. FACILITY'S EPA I.D. NO.

OHD068111327

X. FACILITY NAME

EVERGREEN LANDFILL

XI. FACILITY'S ADDRESS

2625 EAST BROADWAY

Street or P.O. Box

NORTHWOOD

City or Town

OH 43614

State Zip Code

XII. WASTE IDENTIFICATION

LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	WASTEWATER TREATMENT SLUDGE FROM ELECTROPLATING OPER.	1 2	K006	1200	T
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by section number)

JUL 15 RECD

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

II. GENERATOR'S EPA I.D. NUMBER

T A C
MED053568602
1 2 13 14 15

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

III. NAME OF INSTALLATION

GMC-FISHER BODY DIV-FLINT COLDWATER RD
10 69

IV. INSTALLATION MAILING ADDRESS

3145 E COLDWATER RD
15 16 45
Street or P.O. Box

FLINT MI 48 559
15 16 41 42 47 51
City or Town State Zip Code

Tear out here

V. LOCATION OF INSTALLATION (if different than section IV above)

S
15 16 45
Street or Route number

6
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

FOCKLER, DUANE ENVIR. ENG.
15 16 45
Name (last and first)

313-785-4983
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

For ROBERT W DECELLE PLANT MANAGER 2-27-84
Print/Type Name Title Signature of Authorized Representative Date Signed

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 1 6 0 F S T A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

NELSON INDUSTRIAL SERVICE

X. FACILITY'S EPA I.D. NO.

M I D 0 9 8 0 1 1 9 9 2

XI. FACILITY ADDRESS

12345 SCHAEFER HWY.
DETROIT, MICHIGAN 48227

XII. TRANSPORTATION SERVICES USED

NELSON INDUSTRIAL SERVICE - MID 0980 11992

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	CYANIDE FILTER PAPERS - DRY - USED IN CHROME PLATING PROCESS	18	F008	8800	P
	2	NICKEL FILTER PAPERS - DRY - USED IN CHROME PLATING PROCESS	15	F008	12800	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MID 005356860 FAC

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ORGANIC CHEMICAL CO.

X. FACILITY'S EPA I.D. NO.

MID 990858003

XI. FACILITY ADDRESS

3191 CHICAGO ROAD
GRANDVILLE, MICH. 49418

XII. TRANSPORTATION SERVICES USED

SPARTAN CHEMICAL CO. - MID 079300115

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. RCRA (DOT Hazard Class)	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	SPENT PAINT THINNING CHEMICAL	108	F003	14850	D ✓
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

MID 005 956 860

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CECOS / CER COMPANY

X. FACILITY'S EPA I.D. NO.

OHD 987 433 744

XI. FACILITY ADDRESS

3091 ACER ROAD
WILLIAMSBURG, OHIO 45176

XII. TRANSPORTATION SERVICES USED

A-1 DISPOSAL CORPORATION - MID 005 969 452

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. (Optional) Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	SOLVENT BASED ADHESIVE SLUDGE ONLY H/L 001	08	D001	24,600.00	P V
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

[redacted]

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 8 6 0 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM-MET SERVICES

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 8 1 9 4

XI. FACILITY ADDRESS

18550 ALLEN ROAD
WYANDOTTE, MICH. 48192

XII. TRANSPORTATION SERVICES USED

A-1 DISPOSAL CORPORATION - MID 059695452

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Class	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	RESIN BOOM SLUDGE DRY H/L #1	1 5	D 0 0 1	1 8 0 9 0 0	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

Do not mail here

XIV. COMMENTS (enter information by section number—see instructions)

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 93 Page No. 1 of 4

(2) ☒ GENERATOR EPA ID NUMBER NYD002215226 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME GMC DELCO PRODUCTS
STREET 1555 LYELL AVENUE PO BOX 230
CITY ROCHESTER STATE NY ZIP CODE 14601

(3) ☐ TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER NYD080336241 NYSDEC Facility I.D. No. 32202
NAME CECOS INTERNATIONAL, INC.
STREET NIAGARA FALLS BLVD. and WALMORE ROAD
CITY NIAGARA FALLS STATE NY ZIP CODE 14302

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
METAL HYDROXIDE SLUDGE FROM WASTEWATER TREATMENT, HAZARDOUS WASTE SOLID, N.O.S.	F010 16	04	D81	424	04	02
	D010 15					
	D010 17					
	D010 18					
METAL HYDROXIDE SLUDGE FROM WASTEWATER TREATMENT, HAZARDOUS WASTE, SOLID, N.O.S.	F010 16	04	T219	1178	04	02
	D010 15					
	D010 17					
	D010 18					

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME RONALD C. DiLIDDO TITLE PLANT MANAGER
SIGNATURE Ronald C. DiLiddo DATE 2/22/94

INSTRUCTION SHEET

This form is an annual reporting form for use by New York generators of hazardous waste.
This report must be completed by all generators of over 100 kilograms of hazardous waste per month and submitted to the New York State Department of Environmental Conservation, Division of Solid and Hazardous Waste, Manifest Section, P.O. Box 12820, Albany, New York 12212 by March 1 of each year. Generators of under 100 kilograms of hazardous waste per month should just complete Section 2 (Name and Address), check the box indicating "exempt generator", and return the form to the above indicated address.

SECTION (1) **Heading**—If more than one page is used, complete the section: Page _____ of _____.

SECTION (2) **Generator**—Place an "x" in the box which indicates your status as follows:
GENERATOR—for generators of over 1,000 kilograms per month.
SMALL GENERATOR—for generators of between 100 and 1,000 kilograms per month.
EXEMPT GENERATOR—for generators of less than 100 kilograms per month.
All generators of over 1,000 kilograms per month must have and indicate an EPA ID number. Finally, type the generator name and full address. Leave transporter section blank.

SECTION (4) **Treatment, storage and disposal facility (TSDF)**—Complete this section indicating the EPA ID number, name and address. Post office boxes are not acceptable. For each TSDF utilized, a separate sheet must be filled out indicating all the waste sent to that TSDF. In case of on-site treatment (or storage), another sheet should be filled out indicating your facility as the TSDF.

SECTION (5) **Waste Description**—Briefly describe each waste that was sent to the TSDF(s) listed under Section 3. Use either the EPA or DOT description from the manifest. The waste description must be repeated for each handling method used. Use additional sheets if necessary. As an example, if 10,000 gallons of D002 were sent to a TSDF during a year, 2,000 gallons of which were incinerated (T06) and 8,000 gallons were treated by fuels blending (T08), you would fill out Section 4 as follows:

Waste Description	Waste Code	Form	Handling Method	Quantity	Units	On-Off Site
Waste Ignitable Liquid	D002	01	T06	2,000	01	02
Waste Ignitable Liquid	D002	01	T08	8,000	01	02

All wastes including on-site treated aqueous wastewater must be included in this report.

SECTION (6) **Waste Code**—Under the heading "waste code", enter the EPA waste type code specific to the waste identified in 40 CFR Part 261 and 6 NYCRR Part 366.

SECTION (7) **Form**—Indicate the "Form" as follows: 01 = liquid; 02 = solid; 03 = gas; 04 = sludge

SECTION (8) **Handling Method**—The handling method is the method utilized by the TSDF for disposal. The handling methods are located on the Part B of the manifest. For on-site treatment or to find a handling method code if wastes are not manifested, you can find the codes listed in the Hazardous Waste Guidance Manual.

SECTION (9) **Quantity**—For each TSDF listed, the quantity is the total amount of material of a particular waste code treated by a particular handling method. In the example given above, the quantity would be 2,000 gallons of D002 with a T06 handling method, and 8,000 gallons of D002 with a T08 handling method. Do not use 10,000 gallons of D002 because this 10,000 was not treated the same way. Conversely, if wastes are generated and treated in the same facility by the same method, they **must** be added together so that only one entry appears. If a waste has been shipped using different units, (gallons and pounds), they must be converted to one unit and entered on the form as one waste. Use the following conversion factors to change from one unit to another:
One gallon = 8.34 pounds, one ton = 2,000 pounds, one cubic yard = one ton.

SECTION (10) **Units**—The "Units" are indicated as follows: 01 = gallons; 02 = cubic yards; 03 = pounds; 04 = tons.

SECTION (11) **On-Off Site**—Designate whether the waste was disposed on-site of generation (or stored on-site and never treated that year), or off-site at a TSDF. Indicate 01 for on-site (TSDF and generator the same) or 02 for off-site treatment. On-site treatment also includes any hazardous wastewater treated and disposed in conjunction with a NYS DEC SPEDS permit.

SECTION (12) **Affirmation Clause**—The generator must type or legibly print his name, title and date on the bottom of the form. The form should then be signed and, mailed to the address listed below.

New York State
Department of Environmental Conservation,
P.O. Box 12820
Albany, New York 12212

47.15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 2 of 4

(2) ☒ GENERATOR EPA ID NUMBER NYD002215226 OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME GMC DELCO PRODUCTS
STREET 1555 LYELL AVENUE PO BOX 230
CITY ROCHESTER STATE NY ZIP CODE 14601

(3) ☐ TRANSPORTER EPA ID NUMBER NYSDEC Part 364 Permit No.
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER NYD049836679 NYSDEC Facility I.D. No. 32B12
NAME SCA CHEMICAL SERVICES, INC.
STREET 1550 BALMER ROAD
CITY MODEL CITY STATE NY ZIP CODE 14107

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
METAL HYDROXIDE SLUDGE FROM WASTEWATER TREATMENT, HAZARDOUS WASTE, SOLID, N.O.S.	F006	04	D81	330	04	02
	D005					
	D007					
	D008					
BARIUM FERRITE SLUDGE FROM MAGNET MANUFACTURING HAZARDOUS WASTE, SOLID, N.O.S.	D005	04	D81	1832	04	02
	D008					

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME RONALD C. DiLIDDO TITLE PLANT MANAGER
SIGNATURE Ronald C. DiLiddo DATE 2/22/84

INSTRUCTION SHEET

This form is an annual reporting form for use by New York generators of hazardous waste.
This report must be completed by all generators of over 100 kilograms of hazardous waste per month and submitted to the New York State Department of Environmental Conservation, Division of Solid and Hazardous Waste, Manifest Section, P.O. Box 12820, Albany, New York 12212 by March 1 of each year. Generators of under 100 kilograms of hazardous waste per month should just complete Section 2 (Name and Address), check the box indicating "exempt generator", and return the form to the above indicated address.

SECTION (1) Heading—If more than one page is used, complete the section: Page _____ of _____.

SECTION (2) Generator—Place an "x" in the box which indicates your status as follows:
GENERATOR—for generators of over 1,000 kilograms per month.
SMALL GENERATOR—for generators of between 100 and 1,000 kilograms per month.
EXEMPT GENERATOR—for generators of less than 100 kilograms per month.
All generators of over 1,000 kilograms per month must have and indicate an EPA ID number. Finally, type the generator name and full address. Leave transporter section blank.

SECTION (4) Treatment, storage and disposal facility (TSDF)—Complete this section indicating the EPA ID number, name and address. Post office boxes are not acceptable. For each TSDF utilized, a separate sheet must be filled out indicating all the waste sent to that TSDF. In case of on-site treatment (or storage), another sheet should be filled out indicating your facility as the TSDF.

SECTION (5) Waste Description—Briefly describe each waste that was sent to the TSDF(s) listed under Section 3. Use either the EPA or DOT description from the manifest. The waste description must be repeated for each handling method used. Use additional sheets if necessary. As an example, if 10,000 gallons of D002 were sent to a TSDF during a year, 2,000 gallons of which were incinerated (T06) and 8,000 gallons were treated by fuels blending (T08), you would fill out Section 4 as follows:

Waste Description	Waste Code	Form	Handling Method	Quantity	Units	On-Off Site
Waste Ignitable Liquid	D002	01	T06	2,000	01	02
Waste Ignitable Liquid	D002	01	T08	8,000	01	02

All wastes including on-site treated aqueous wastewater must be included in this report.

SECTION (6) Waste Code—Under the heading "waste code", enter the EPA waste type code specific to the waste identified in 40 CFR Part 261 and 6 NYCRR Part 366.

SECTION (7) Form—Indicate the "Form" as follows: 01 = liquid; 02 = solid; 03 = gas; 04 = sludge

SECTION (8) Handling Method—The handling method is the method utilized by the TSDF for disposal. The handling methods are located on the Part B of the manifest. For on-site treatment or to find a handling method code if wastes are not manifested, you can find the codes listed in the Hazardous Waste Guidance Manual.

SECTION (9) Quantity—For each TSDF listed, the quantity is the total amount of material of a particular waste code treated by a particular handling method. In the example given above, the quantity would be 2,000 gallons of D002 with a T06 handling method, and 8,000 gallons of D002 with a T08 handling method. Do not use 10,000 gallons of D002 because this 10,000 was not treated the same way. Conversely, if wastes are generated and treated in the same facility by the same method, they must be added together so that only one entry appears. If a waste has been shipped using different units, (gallons and pounds), they must be converted to one unit and entered on the form as one waste. Use the following conversion factors to change from one unit to another:
One gallon = 8.34 pounds, one ton = 2,000 pounds, one cubic yard = one ton.

SECTION (10) Units—The "Units" are indicated as follows: 01 = gallons; 02 = cubic yards; 03 = pounds; 04 = tons.

SECTION (11) On-Off Site—Designate whether the waste was disposed on-site of generation (or stored on-site and never treated that year), or off-site at a TSDF. Indicate 01 for on-site (TSDF and generator the same) or 02 for off-site treatment. On-site treatment also includes any hazardous wastewater treated and disposed in conjunction with a NYS DEC SPEDS permit.

SECTION (12) Affirmation Clause—The generator must type or legibly print his name, title and date on the bottom of the form. The form should then be signed and, mailed to the address listed below.

New York State
Department of Environmental Conservation
P.O. Box 12820
Albany, New York 12212

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 3 of 4

(2) ☒ GENERATOR EPA ID NUMBER [redacted] OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME GMC DELCO PRODUCTS
STREET 1555 LYELL AVENUE PO BOX 230
CITY ROCHESTER STATE NY ZIP CODE 14601

(3) ☐ TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No.

NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER NYD043815703 NYSDEC Facility I.D. No. 32804
NAME FRONTIER CHEMICAL WASTE PROCESS, INC.
STREET 4626 ROYAL AVENUE
CITY NIAGARA FALLS STATE NY ZIP CODE 14303

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
METAL HYDROXIDE SLUDGE FROM WASTEWATER TREATMENT, HAZARDOUS WASTE, SOLID, N.O.S.	F 010 16	014	T 22	3,000	04	02
	D 010 15					
	D 010 17					
	D 010 18					
METAL HYDROXIDE SLUDGE FROM WASTEWATER TREATMENT, HAZARDOUS WASTE, SOLID, N.O.S.	F 010 16	014	T 40	12	04	02
	D 010 15					
	D 010 17					
	D 010 18					

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME RONALD C. DiLiDDo TITLE PLANT MANAGER
SIGNATURE Ronald C. DiLiDDo DATE 2-20-84

INSTRUCTION SHEET

This form is an annual reporting form for use by New York generators of hazardous waste.
This report must be completed by all generators of over 100 kilograms of hazardous waste per month and submitted to the New York State Department of Environmental Conservation, Division of Solid and Hazardous Waste, Manifest Section, P.O. Box 12820, Albany, New York 12212 by March 1 of each year. Generators of under 100 kilograms of hazardous waste per month should just complete Section 2 (Name and Address), check the box indicating "exempt generator", and return the form to the above indicated address.

SECTION (1) Heading—If more than one page is used, complete the section: Page _____ of _____.

SECTION (2) Generator—Place an "x" in the box which indicates your status as follows:
GENERATOR—for generators of over 1,000 kilograms per month.
SMALL GENERATOR—for generators of between 100 and 1,000 kilograms per month.
EXEMPT GENERATOR—for generators of less than 100 kilograms per month.
All generators of over 1,000 kilograms per month must have and indicate an EPA ID number. Finally, type the generator name and full address. Leave transporter section blank.

SECTION (4) Treatment, storage and disposal facility (TSDF)—Complete this section indicating the EPA ID number, name and address. Post office boxes are not acceptable. For each TSDF utilized, a separate sheet must be filled out indicating all the waste sent to that TSDF. In case of on-site treatment (or storage), another sheet should be filled out indicating your facility as the TSDF.

SECTION (5) Waste Description—Briefly describe each waste that was sent to the TSDF(s) listed under Section 3. Use either the EPA or DOT description from the manifest. The waste description must be repeated for each handling method used. Use additional sheets if necessary. As an example, if 10,000 gallons of D002 were sent to a TSDF during a year, 2,000 gallons of which were incinerated (T06) and 8,000 gallons were treated by fuels blending (T08), you would fill out Section 4 as follows:

Waste Description	Waste Code	Form	Handling Method	Quantity	Units	On-Off Site
Waste Ignitable Liquid	D002	01	T06	2,000	01	02
Waste Ignitable Liquid	D002	01	T08	8,000	01	02

All wastes including on-site treated aqueous wastewater must be included in this report.

SECTION (6) Waste Code—Under the heading "waste code", enter the EPA waste type code specific to the waste identified in 40 CFR Part 261 and 6 NYCRR Part 366.

SECTION (7) Form—Indicate the "Form" as follows: 01 = liquid; 02 = solid; 03 = gas; 04 = sludge

SECTION (8) Handling Method—The handling method is the method utilized by the TSDF for disposal. The handling methods are located on the Part B of the manifest. For on-site treatment or to find a handling method code if wastes are not manifested, you can find the codes listed in the Hazardous Waste Guidance Manual.

SECTION (9) Quantity—For each TSDF listed, the quantity is the total amount of material of a particular waste code treated by a particular handling method. In the example given above, the quantity would be 2,000 gallons of D002 with a T06 handling method and 8,000 gallons of D002 with a T08 handling method. Do not use 10,000 gallons of D002 because this 10,000 was not treated the same way. Conversely, if wastes are generated and treated in the same facility by the same method, they must be added together so that only one entry appears. If a waste has been shipped using different units, (gallons and pounds), they must be converted to one unit and entered on the form as one waste. Use the following conversion factors to change from one unit to another:
One gallon = 8.34 pounds, one ton = 2,000 pounds, one cubic yard = one ton.

SECTION (10) Units—The "Units" are indicated as follows: 01 = gallons; 02 = cubic yards; 03 = pounds; 04 = tons.

SECTION (11) On-Off Site—Designate whether the waste was disposed on-site of generation (or stored on-site and never treated that year), or off-site at a TSDF. Indicate 01 for on-site (TSDF and generator the same) or 02 for off-site treatment. On-site treatment also includes any hazardous wastewater treated and disposed in conjunction with a NYS DEC SPEDS permit.

SECTION (12) Affirmation Clause—The generator must type or legibly print his name, title and date on the bottom of the form. The form should then be signed and, mailed to the address listed below.

New York State
Department of Environmental Conservation
P.O. Box 12820
Albany, New York 12212

47-15-17 (12/83)

(1) NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID AND HAZARDOUS WASTE

GENERATOR / WASTE TRANSPORTER ANNUAL REPORT

for the year ending December 31, 19 83 Page No. 4 of 4

(2) ☒ GENERATOR EPA ID NUMBER [redacted] OR ☐ SMALL GENERATOR ☐ EXEMPT GENERATOR

NAME GMC DELCO PRODUCTS
STREET 1555 LYELL AVENUE PO BOX 230
CITY ROCHESTER STATE NY ZIP CODE 14601

(3) ☐ TRANSPORTER EPA ID NUMBER [redacted] NYSDEC Part 364 Permit No. [redacted]
NAME
STREET
CITY STATE ZIP CODE

(4) TREATMENT, STORAGE, OR DISPOSAL FACILITY (TSDF)
EPA ID NUMBER NYD991291782 NYSDEC Facility I.D. No. 1.5M07
NAME VOELKER ANALYSIS, INC.
STREET 766 BABCOCK STREET
CITY BUFFALO STATE NY ZIP CODE 14206

WASTE INFORMATION

(5) WASTE DESCRIPTION	(6) WASTE CODE	(7) FORM	(8) HANDLING METHOD	(9) QUANTITY	(10) UNITS	(11) ON-OFF SITE
WASTE 1,1,1-TRICHLORO-ETHANE, DEGREASING SOLVENT.	F10012	01	T54	28	04	02
	F10012	04				
WASTE FREON/ACETONE MIXTURE, DEGREASING SOLVENT. HAZARDOUS WASTE, LIQUID, N.O.S.	F10013	01	T54	30	04	02
	F10013	04				

I hereby affirm under penalty of perjury that information provided on this form is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

(12) PRINT OR TYPE NAME RONALD C. DiLADO TITLE PLANT MANAGER
SIGNATURE Ronald C. DiLadd. DATE 2/22/84

INSTRUCTION SHEET

This form is an annual reporting form for use by New York generators of hazardous waste.
This report must be completed by all generators of over 100 kilograms of hazardous waste per month and submitted to the New York State Department of Environmental Conservation, Division of Solid and Hazardous Waste, Manifest Section, P.O. Box 12820, Albany, New York 12212 by March 1 of each year. Generators of under 100 kilograms of hazardous waste per month should just complete Section 2 (Name and Address), check the box indicating "exempt generator", and return the form to the above indicated address.

SECTION (1) **Heading**—If more than one page is used, complete the section: Page _____ of _____.

SECTION (2) **Generator**—Place an "x" in the box which indicates your status as follows:
GENERATOR—for generators of over 1,000 kilograms per month.
SMALL GENERATOR—for generators of between 100 and 1,000 kilograms per month.
EXEMPT GENERATOR—for generators of less than 100 kilograms per month.
All generators of over 1,000 kilograms per month must have and indicate an EPA ID number. Finally, type the generator name and full address. Leave transporter section blank.

SECTION (4) **Treatment, storage and disposal facility (TSDF)**—Complete this section indicating the EPA ID number, name and address. Post office boxes are not acceptable. For each TSDF utilized, a separate sheet must be filled out indicating all the waste sent to that TSDF. In case of on-site treatment (or storage), another sheet should be filled out indicating your facility as the TSDF.

SECTION (5) **Waste Description**—Briefly describe each waste that was sent to the TSDF(s) listed under Section 3. Use either the EPA or DOT description from the manifest. The waste description must be repeated for each handling method used. Use additional sheets if necessary. As an example, if 10,000 gallons of D002 were sent to a TSDF during a year, 2,000 gallons of which were incinerated (T06) and 8,000 gallons were treated by fuels blending (T08), you would fill out Section 4 as follows:

Waste Description	Waste Code	Form	Handling Method	Quantity	Units	On-Off Site
Waste Ignitable Liquid	D002	01	T06	2,000	01	02
Waste Ignitable Liquid	D002	01	T08	8,000	01	02

All wastes including on-site treated aqueous wastewater must be included in this report.

SECTION (6) **Waste Code**—Under the heading "waste code", enter the EPA waste type code specific to the waste identified in 40 CFR Part 261 and 6 NYCRR Part 366.

SECTION (7) **Form**—Indicate the "Form" as follows: 01 = liquid; 02 = solid; 03 = gas; 04 = sludge

SECTION (8) **Handling Method**—The handling method is the method utilized by the TSDF for disposal. The handling methods are located on the Part B of the manifest. For on-site treatment or to find a handling method code if wastes are not manifested, you can find the codes listed in the Hazardous Waste Guidance Manual.

SECTION (9) **Quantity**—For each TSDF listed, the quantity is the total amount of material of a particular waste code treated by a particular handling method. In the example given above, the quantity would be 2,000 gallons of D002 with a T06 handling method, and 8,000 gallons of D002 with a T08 handling method. Do not use 10,000 gallons of D002 because this 10,000 was not treated the same way. Conversely, if wastes are generated and treated in the same facility by the same method, they must be added together so that only one entry appears. If a waste has been shipped using different units, (gallons and pounds), they must be converted to one unit and entered on the form as one waste. Use the following conversion factors to change from one unit to another:

One gallon = 8.34 pounds, one ton = 2,000 pounds, one cubic yard = one ton.

SECTION (10) **Units**—The "Units" are indicated as follows: 01 = gallons; 02 = cubic yards; 03 = pounds; 04 = tons.

SECTION (11) **On-Off Site**—Designate whether the waste was disposed on-site of generation (or stored on-site and never treated that year), or off-site at a TSDF. Indicate 01 for on-site (TSDF and generator the same) or 02 for off-site treatment. On-site treatment also includes any hazardous wastewater treated and disposed in conjunction with a NYS DEC SPEDS permit.

SECTION (12) **Affirmation Clause**—The generator must type or legibly print his name, title and date on the bottom of the form. The form should then be signed and, mailed to the address listed below.

New York State
Department of Environmental Conservation,
P.O. Box 12820
Albany, New York 12212

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 9 | 8 | 0 | 7 | 0 | 0 | 8 | 0 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

INT 190010397
IND 048522460
IND016398695
ILD 069506160
IND 084256943
IND 190014472
IND 058484114
MID 059695452

X. FACILITY'S NAME (specify) | A | D | A | M | S | | C | E | N | T | E | R | | A | N | D | | F | I | L | L | | N | | | | | FACILITY'S EPA ID NUMBER | I | N | D | 0 | 1 | 7 | 8 | 9 | 1 | 1 | 1 | 4 | 6 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 4 | 6 | 3 | 6 | | A | D | A | M | S | | C | E | N | T | E | R | | R | O | A | D | | | | | | | | | | |

City or Town | F | O | R | T | | W | A | Y | N | E | | | | | | | | | State | I | N | Zip | 4 | 6 | 8 | 0 | 6 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	Wastewater Treatment Sludge from Electroplating Operations	1 | 5	F 0 0 6	| | | 2 | 4 | 4 | 3	P * (T)
2	Dirt, Debris from Decommissioned Plating Line	|	F 0 0 6	| | | | 4 | 3 | 4	P * (T)
3		|		| | | | | | |	P * T
4		|		| | | | | | |	P * T
5		|		| | | | | | |	P * T
6		|		| | | | | | |	P * T
7		|		| | | | | | |	P * T
8		|		| | | | | | |	P * T

XIII. COMMENTS (enter information by line number -- see instructions)

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 9 | 8 | 0 | 7 | 4 | 4 | 4 | 4 | 4 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify;

| A | M | E | R | I | C | A | N | | C | H | E | M | I | C | A | L | | S | E | R | V | I | C | E | S | | |

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 1983

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I | N | D | 9 | 8 | 0 | 7 | 0 | 0 | 8 | 0 | 1 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) — FACILITY'S EPA ID NUMBER

| I | L | W | D. | I | N | C. | | |

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 1983

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I N D 9 8 0 7 0 0 8 9 0 1 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) | F I S H E R - C A L L O N M E M O R I A L S. I O L I V E N T S | FACILITY'S EPA ID NUMBER | I N D 0 0 8 4 2 5 6 9 4 1 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 5 8 8 5 | 4 8 T H A V E N U E | | |

Division of Land Pollution Control
INDIANA STATE BOARD OF HEALTH
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

STATE OF INDIANA

FORM G: GENERATOR ANNUAL REPORT FOR THE YEAR ENDING DEC. 31, 19 83

ENVIRONMENTAL MANAGEMENT BOARD

(Collected under the authority of IC 13-7-8.5-2 Indiana Environmental Management Act)

VIII. GENERATOR'S EPA ID NUMBER | I N D 0 9 8 0 7 7 0 8 4 0 |

IX. TRANSPORTATION SERVICES USED This information is required only on one copy of Form G.

List the EPA Identification Numbers for all transporters whose services were used during the year.

X. FACILITY'S NAME (specify) | A T T I P E T R O L E U M C O R P O R A T I O N | FACILITY'S EPA ID NUMBER | I N D 0 5 9 6 1 9 5 4 5 2 |

XI. FACILITY'S ADDRESS

Street or P. O. Box | 4 0 0 | B R O A D | S T R E E T |

City or Town | P L A I N W E L L | State | I N | Zip | 4 6 0 6 8 |

XII. WASTE IDENTIFICATION

LINE NUMBER	(A.) DESCRIPTION OF WASTE	(B.) DOT HAZARD CLASS	(C.) EPA HAZARDOUS WASTE (see code)	(D.) AMOUNT OF WASTE (in Pounds or Tons)	(E.) UNIT OF WEIGHT (circle one)
1	waste modified diisocyanate mixture	1 5	D 0 0 3	3 7 2 8 0	(P) T
2					P T
3					P T
4					P T
5					P T
6					P T
7					P T
8					P T

XIII. COMMENTS (enter information by line number -- see instructions)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Type or print using dark ink (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

T A C

		O	K	D	0	8	2	5	6	5	7	1	4	1
1	2											13	14	15

This Installation's Non-Regulated Status is Expected to Apply

☐ For 1983 Only ☐ Permanently

☒ Other Interim Status - Pending Part B Permit Approval

CBD ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

G I M I A I D I O I K I L I A I H I O I M I A I C I I I T I Y I P I L I A I N I T I
30 69

IV. INSTALLATION MAILING ADDRESS

P O B O X 1 2 6 5 2 7
15 16 45
Street or P.O. Box

O K L A H O M A C I T Y
15 16
O K 7 3 1 2 6
41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

7 4 4 7 S E 7 4 t h S t r e e t
15 16 45
Street or Route number

O K L A H O M A C I T Y
15 16
O K 7 3 1 2 6
41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

T R I P J A I T H I Y N I O R I A
15 16 45
Name (last and first)

4 0 5 - 7 3 3 - 6 1 1 0 2
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. W. Evans, Plant Manager — April 18, 1984

Print/Type Name — Title — Signature of Authorized Representative — Date Signed

Page 1 of ____

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO.

O K D 0 1 8 2 5 6 5 5 7 1 1

IX. FACILITY NAME (Identify facility to which all wastes on this page were shipped)

U. S. Pollution Control, Inc.

X. FACILITY'S EPA I.D. NO.

O K D 0 1 5 4 3 8 3 7 6

XI. FACILITY ADDRESS

2000 Classen Center
Suite 224 South
Oklahoma City, OK 73106

XII. TRANSPORTATION SERVICES USED

U. S. Pollution Control, Inc.
Transporter EPA I.D. Nos. OKT410010466
OKT410010473

XIII. WASTE IDENTIFICATION

Source Code	No.	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	Combined sludge shipmment (waste-water & Paint sludge, phosphatizing sludge etc.)	1,5	F 0 1 7 / F 0 0 6	5 8 8 0	a
	2	Residual Drums	—		5 0 4	b
	3	Waste Sealers	1,5		3 3 7	c
	4	Waste Solvents	0,8	F 0 0 3 / F 0 0 5	2 1 1 7 0	G (d)
	5	Waste Waterbase Paint	0,8		1 9 5 0 0	G (e)
	6	Waste Oils	0,1	D 0 0 1	1 8 0 0	G (f)
	7	Coal Ash *		N/A	6 1 6 0	a
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

a. expressed in cubic yards
b. 55-gallon drums containing more than one inch but less than 6 inches of residual
c. 55-gallon drums containing waste sealer and adhesive
d. waste solvents in gallons - approximate density 0.901
e. wastebase paint in gallons - approximate density 1.2
f. waste oils in gallons - approximate density 0.915
*. disposal facility address - Fill Sand Rd.
8701 West Reno
Oklahoma City, Oklahoma

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31 19 83

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. GENERATOR'S EPA I.D. NUMBER

T/A/C

(1) F|O|H|D|0|1|8|4|1|4|2|9|2| |1| (15)

II. NAME OF INSTALLATION

(16) G|M|C| |P|A|C|K|A|R|D| |E|L|E|C|T|R|I|C| |D|I|V|.| |C|I|T|Y| |P|L|A|N|T| | (47)

III. INSTALLATION MAILING ADDRESS

(15) P|.|O|.| |B|O|X| |4|3|1| | | |

OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

GENERATOR ANNUAL HAZARDOUS WASTE REPORT (cont.)

For the calendar year ending December 31, 19 83

FACILITY INFORMATION

(Specify facility to which all wastes on this page were sent)

VIII. GENERATOR'S EPA I.D. NO.

T/AC

C O H D 0 1 3 4 1 4 2 9 2 12

IX. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4

X. FACILITY NAME

C H E M - M E T S E R V I C E S

XI. FACILITY'S ADDRESS

1 8 5 5 0 A L L E N R O A D

Street or P.O. Box

W Y A N D O T T E M I 4 8 1 9 2

City or Town State Zip Code

XII. WASTE IDENTIFICATION

ITEM NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS	C. USEPA HAZARDOUS WASTE NUMBER (See instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)
1	Waste Mixed Solvents and Paints	0 7	D 0 0 1	4 3 1 8	P
2	Waste Ammonium Persulfate with Copper Sludge	0 2	D 0 0 2	1 8 9 5 0	P
3	Waste Cleaning Compound	0 2	D 0 0 2	6 5 4 5	P
4	Waste Methylene Chloride with Isocyanates	1 2	F 0 0 2	9 3 5	P
5	Waste Heat Treat Salts (Nitrates)	1 3	F 0 1 1 D 0 0 3	5 2 2 5	P
6	Waste Mixed Solvents, Degreasing	0 7	F 0 0 1 D 0 0 1	1 2 2 4 5	P
7	Waste Mixed Solvents, Cleaning	0 7	F 0 0 5 D 0 0 1	7 9 5 5	P
8					
9					
10					
11					
12					

XIII. COMMENTS (enter information by item number)

Wastes were treated at Chem-Met by a solidification method for final disposal.

Ms. FERRARO. Mr. Bonczek, do you have that information for your company? How much does your company generate each year?

Mr. BONCZEK. We send off—we send roughly 33,000 dry tons of hazardous waste outside the Du Pont Co., to outside contractors. Basically a third of that is treated in such a way as to render it nonhazardous. The remaining portion is land disposed, either through a landfill or deep well.

Ms. FERRARO. Mr. Hedge, did IBM's environmental programs department exist at the time you first began using Seymour Recycling?

Mr. HEDGE. Yes, it did.

Ms. FERRARO. Did they approve the facility?

Mr. HEDGE. No, they did not.

Ms. FERRARO. Why did you go ahead and use it, then?

Mr. HEDGE. In that timeframe, sites were approved by a local site management, plant management. Technical-environmental staff at those sites visited Seymour before it was approved by the particular plant managers. It was in the approximately mid-1970's that we changed that—the late 1970's—that we began to change that practice within the company, to require all the sites to be approved on a corporatewide basis. One of the things we were learning was that that was a far better way to approach the problem.

Ms. FERRARO. So, now the Environmental Programs Department would be in charge of approving a site——

Mr. HEDGE. Yes.

Ms. FERRARO. And determining whether or not——

Mr. HEDGE. Yes.

Ms. FERRARO. In your testimony you indicated that IBM had removed all of its waste from that site 2 years prior to this negotiation going on. Earlier in your testimony you said there were approximately 50,000 barrels on the site that were rusting and deteriorating. How do you know that you removed all of your waste if there were rusting and deteriorating barrels, which, I assume, could not be identified?

Mr. TOPOL. I think, probably, if you don't mind, Mr. Hedge could talk to that for a minute.

Mr. HEDGE. Well, the approach that we took, as I mentioned in my statement, was to send our own technical people out there from our corporate staff to work with two contractors; and what we did was try to identify anything that had any label, or tag, or barrel, or whatever that came from IBM. I cannot tell you absolutely that the cycling company had not switched some of our material from our barrels to another barrel that was unidentified. And one of the reasons I raised that point is we were pretty sure as we analyzed all the drums before we removed them from the site into the ultimate incinerator, that some of the materials in our drums were not sent to the site by IBM because they were chemicals that we did not use in the plants that were using the site. So, it was indicated to us that perhaps the site management had been using empty drums and barrels over time for temporary storage of other materials. So, it was purely on a site check, Congresswoman.

Ms. FERRARO. Again, there is no way to affirm and prove that every single piece is yours?

Mr. HEDGE. Absolutely. And there could have been some things in the bulk storage tanks that were IBM materials that we couldn't identify.

Ms. FERRARO. It has been described as a fair deal to the taxpayer. I'm not quite sure I agree with that. It's costing the taxpayer money, but it was a good deal and the lawyers were pretty good.

I concede to the gentle Congresswoman.

Mrs. JOHNSON. Thank you.

The problem that has been very difficult for me to evaluate that I see behind the issue of negotiated settlements is the availability of data showing the extent of contamination and our options as to the proposed solutions. First, I would like to pursue the data issue a little bit with Dr. Chu, if I may.

When this site was exposed by means of the excavation of one foot of soil, were there any tests done to determine whether or not the one foot was sufficient to confirm the implications of the area photographed?

Mr. CHU. First, you cannot do that in that there is no criteria to determine what is sufficient. First, we have to have a set of criteria.

First, we have to have a set of criteria before you determine that something is sufficient—1 foot is sufficient or 2 feet are sufficient or what.

Mrs. JOHNSON. Is there no agreement on what level of contamination represents a public health hazard?

Mr. CHU. Yes.

Mrs. JOHNSON. You are saying there is no way?

Mr. CHU. That is, the "how clean is clean" issue has not been resolved, therefore, up until now, what we're doing there. What is left should be removed.

Mrs. JOHNSON. Were there tests taken once 1 foot was removed?

Mr. CHU. The 1 foot of soil, I think the tests of the soil were for the disposal and transportation purpose but not for——

Mrs. JOHNSON. Mr. Hedge.

Mr. HEDGE. I believe, if my recollection serves me right, there were tests made where 1 foot had been removed. These tests were made according to a predetermined analysis plan between the settlers and the government. There were tests made to see if there were what the technical people would call "hot spots." If they were determined to be "hot spots" additional soil was removed to mitigate the "hot spots."

I don't know if Dr. Chu would like to——

Mr. CHU. I think when chemical waste come tomorrow, I think they will tell you more detail on the removal. I think that would be a better time to ask them.

Mrs. JOHNSON. I don't understand the apparent contradiction between what Mr. Hedge is saying and what you are saying. He is saying the tests were done at certain "hot spots" according to a predetermined plan. That implies that the tests determined for you whether or not more soil ought to remain, and it also implies some general agreement as to the implications of tests as to what the standard should be to determine exactly how clean is clean. Apparently there was enough agreement about how clean is clean to

allow a determination as to whether the test in some area required the removal of more soil.

Mr. CHU. I don't have that set of criteria, no.

Mr. HEDGE. It was, again, Congresswoman, determined as a "hot spot," where the soil was actually what I would call percolating, or using a layman's term, festering. And where that was determined to be the case, additional soil was removed until that condition was mitigated. And the plan was on a random grid basis.

Anyone like to comment?

Mr. BONCZEK. Madam Congresswoman, I wouldn't have all the specifics of the technical cleanup, but I think the plan that we're trying to get accomplished there with the surface cleanup was to remove what we call the hydraulic head, the physical/chemical driving force that would result in contamination of the ground water, not necessarily to try to clean up the ground to a point that was not injurious a health of the environment: That is sort of a different set of criteria. So, what we were really trying to do is get those chemicals off the surface that could result in subsequent ground water contamination. It is a subjective decision as far as to how deeply one would remove soil. You would remove contaminants to the point that the hydraulic head, to the main degree, is not there anymore.

Mrs. JOHNSON. I appreciate your comments and their implications. However, the testimony of the last few minutes about there being tests and some additional removal appears to be in direct contradiction to yesterday's testimony that there was clearly dramatically discolored soil, and that the contamination level was one that had been disregarded. That is something that I would be interested in pursuing if you have additional information on it in the future and want to submit comments on that issue.

I do think, in the long run, we're going to have to deal with not so much how clean is clean but what do we know and on what basis are these decisions being made.

What are your ideas? What are you doing?

Mr. HEDGE. Sure. We will try to respond to that.

Mr. LEVITAS. Would the gentlewoman yield, please?

Mrs. JOHNSON. Yes.

Mr. LEVITAS. This is an extremely critical point of testimony, and I was going to get back to it on one of my go-rounds. But not only is there a conflict in testimony between what Dr. Hirschhorn suggested yesterday in his comments and what we are hearing today, but as a layman—and I am disqualifying myself from the type of technical expertise that Dr. Chu, and Mr. Hedge, and Mr. Bonzcek each possess—but given this enormous quantity of rusting, leaking drums that had been there by 1982 for at least 5 or 6 years, for the three of you and your companies not to have had a strong suspicion that there was significant penetration of these contaminants into the soil, it is something that is hard for me to understand. And that is why I think Ms. Johnson's questions are so absolutely critical. And I think it is for that reason that many of us have suspicions about the sweetheart aspect of the settlement, knowing that you are looking at possibly $20 to $40 million in additional costs if there, in fact, is such a penetration.

Now, I appreciate your yielding at that point, because I hope you will pursue this, Ms. Johnson. It is terribly important.

Mrs. JOHNSON. Thank you, Mr. Chairman. It is an issue that you raised at the beginning of the questioning, and I see it as the heart of the matter. How could there have been such a great disparity between EPA's plan of removing 5 feet and what actually is there in the soil. I think that has to be dealt with. Whether or not this was a good deal or a bad deal for the public will rest, in some measure, on whether or not we can validate whether that excavation did the job or not.

I would like just a further explanation as to what an aerial photo can and cannot show.

Mr. CHU. If the definition is of visibly contaminated soil, then the photograph——

Mrs. JOHNSON. What shows up in the photograph?

Mr. CHU. It would show a darker color.

Mrs. JOHNSON. A darker color.

So, the darker color could be a higher moisture content.

Mr. CHU. Could be.

Mrs. JOHNSON. Which might not necessarily be dangerous to underground water. So, the aerial photo, wouldn't necessarily reflect the extent of endangerment?

Mr. CHU. I may have made it sound too simple. It is not just an aerial photo alone; the aerial photo is the one that defines the area, but people did go there to see the site, go there to see the visibly contaminated soil which correlates to what the aerial photo shows.

But I want to address one point I have been talking about, that is I fully suspect that there is possibilty that ground water contamination could occur. We believe there is a potential for ground water contamination but we do not believe it is a significant problem there. Now, as yesterday Dr. Hirschhorn talked about an acceptable risk concept, we think the risk not high and it has been shown that in the recent monitoring report we saw from the newspaper report. I did not see the actual data, but it did not say there is a problem.

Now, the science can never prove a negative. Science can never prove that there is no problem. Science will find if there is a problem. Therefore, it is my professional opinion that the monitoring of the ground water should continue just in case the problem may occur. We do believe—I do believe—that it is a potential problem there.

Now we get back to the point of whether this is a good deal for the public or not by removing all those contaminating sources which could make the problem a lot worse. It is a good deal for the public.

Mrs. JOHNSON. Dr. Chu, I fully appreciate the advantages of speedy removal. I also appreciate the obvious concern of each of you at the table with the situation at Seymour and the belief that your company policies appear to have been responsible and foresighted. But I am concerned here with the state of the art and our ability to test soils and to evaluate them and to interpret the meaning of those tests. I gather from Mr. Bonczek and from you,

Dr. Chu, that it is more a problem of our ability to interpret the meaning of the tests than to test.

Mr. CHU. Yes.

Mrs. JOHNSON. So, you have the technical capability of testing for all of the chemicals in the soil. It becomes a question of concentrations and whether a given "concentration" means that leaching will contaminate ground water and would present health hazards? Is that the issue?

Mr. CHU. I would not say that as far as all of the chemicals in the soil, because even considering the chemistry and many things—there could be some compounds for which testing procedures are to be developed. But in general, testing is not a problem but to interpret the data and to indicate what impact on the ground water is a problem. It varies, also, from site to site, because you have to consider what is the capability of the soil in terms of absorption, you have to determine what is the degree of biodegradation and the rate of biodegradation of the organic compounds. So, it is very complicated on the Seymour recycling site, yes.

Mrs. JOHNSON. Mr. Bonczek, do you want to comment?

Mr. BONCZEK. Yes, madam. I think the thing we need to emphasize here, that the primary concern with a hazardous waste disposal site is ground water contamination. There may be some instances that people have an opportunity to come in contact with the soil, but that, in the mainstream, is not the major problem. The major problem is making sure that ground water isn't contaminated, because that is a media which can flow out of the site. We can fence a site to keep people from coming in—or do the best we can—but it is difficult to control ground water flow. So, you are right, the question is, in fact, what chemicals in and what concentration, where is the ground water, what is its rate of flow, who is using that ground water, how long is it going to take to get to some particular point and when. These are very, very complex, technical questions that would take a very long time to deal with.

I think you seem to be at least in my mind confusing possibly, the surface cleanup and the subsurface cleanup. We did not try to deal with the subsurface cleanup, obviously, and that takes quite a long period of time. I think if there would have been a situation where the cleanup plan, which, in fact, was approved by the Government and outside parties, if that had been written in such a way as to try to deal also with the ground water contamination. I don't think there would have been an agreement if subsurface cleanup would have been tried to be implemented, it would have taken—well, as I understand it they are still trying to do that—we may have gotten nothing accomplished.

Mrs. JOHNSON. I'm going to ask one more question and then yield back to the chairman and let my colleagues pursue these issues a little further. I do understand the necessity of separating surface from subsurface cleanup in order to get agreement. On the other hand, the issue was raised as to where there is a logical and reasonable separation.

What is the state of the technology of our ability to identify plumes and to clean them up?

Mr. BONCZEK. The technology exists. It exists to identify chemicals, their concentrations, and their location. Basically what you're

going to do is drill monitoring wells for analytical analyses to try to determine what is in there and in what concentration.

The technology on cleaning up the ground water is in the developmental stage. We are, for example, two of our plants come to mind. We are treating ground water that is, in fact, contaminated. In one particular situation we have interceptor wells. We're pumping it out, running it into a biotreatment facility. In another particular facility we are pumping it to the surface, aerating it because it has very low concentration of organics which dissipate into the air; this is not injurious to the health or the environment. Those kinds of things are in the developmental stage. I suspect there are also other kinds of technology.

Mrs. JOHNSON. Thank you very much.

Mr. LEVITAS. Thank you very much, Ms. Johnson.

Let me, before I recognize my colleague from Texas, let me point out, Dr. Chu, Mr. Hedge, and Mr. Bonczek, that in addition to the obvious—and by "obvious" I mean somebody walking around there and looking at what was happening—it is my understanding that your consultant study, Mr. Hedge, recommended an alternative water supply for those small residential areas nearby. I suggest that if that didn't indicate an awareness of ground water contamination, it certainly threw up the red flag that would have enhanced someone's desire to remove their liability for ground water contamination if it became more apparent at a later point. I am just simply suggesting to you there were all sorts of warning signs of ground water contamination which was within the knowledge of those of you who were dealing with this subject.

Did you want to say something, Mr. Bonczek?

Mr. BONCZEK. Yes. I think rather than being critical about that particular water supply situation, I think that was really a prudent thing to do. As Mr. Chu has already indicated, we couldn't demonstrate that there wasn't a ground water problem. And in order to be prudent and protect the health and the environment, we decided not to take the chance and to provide a separate water supply until we knew more.

Mr. LEVITAS. Mr. Andrews.

Mr. ANDREWS. Thank you, Mr. Chairman.

Just to recount, a little bit, a little history, this lawsuit was filed in May 1980, as I understand it, and I think most of you have stated in writing or to some of us that the case really languished for some period of time and then, in mid-1982 to early September 1982, it accelerated. In fact, as the EPA described it, it was put on a "fast track." An EPA document that is dated September 7 says: "As you know, the Seymour negotiations have been placed on a fast track."

Mr. TOPOL. If I may respond to that, the lawsuit that was filed in May 1980 did not include any generators; it was filed from an old statute directed only against the site owner and operator. Generators became involved initially on our own in 1980 and began to receive letters which we viewed, obviously, as threats of litigation in the 1981 timeframe. In 1981, we gathered information. The generators tried to organize themselves and really began negotiations with the Federal Government in which we took the initiative in response to their letters, beginning in 1982, yes.

Mr. ANDREWS. Well, have you been involved, Mr. Topol, from start to finish, yourself, personally?

Mr. TOPOL. I have been involved from mid-1980, which is the beginning as far as IBM is concerned, roughly, the beginning of the settlement process as opposed to the matters that Art Hedge spoke of.

Mr. ANDREWS. I want my question to be directed to all of you. Do any of you know why that lawsuit—your lawsuit—was certainly accelerated and put on a fast track?

Mr. TOPOL. Well, it is not so much our lawsuit. I mean, why the resolution of Seymour? I can't speak for the Government as to whether they accelerated or why. I could say——

Mr. ANDREWS. That is the purpose of my question.

Mr. TOPOL. I'm sorry. I can't help you, then.

Mr. ANDREWS. Do any of you know why that suit, those negotiations, suddenly were accelerated?

Mr. CHARLA. I do not know.

Mr. CHU. I do not know.

Mr. HEDGE. I do not know.

Mr. BONCZEK. The only thing I know is that the only acceleration that was conducted was in the interest of the environment. As far as our trying to move this process forward, we were trying to get that site cleaned up before the 1982–83 winter came and resulted in further deterioration of those drums.

As far as what the political motivations on the lawsuit go, we have absolutely no knowledge of that.

Mr. ANDREWS. Well, you mentioned that. What do you mean, "political motivation"?

Mr. BONCZEK. Well, I mean the question you seem to be raising seems to be getting at what the EPA, what was in their mind, what was their mind set, as far as pushing this thing forward. I don't know. I was not there. I can't speak for EPA or anybody else that was involved other than ourselves. We were interested in moving this thing forward in order to try to get the site cleaned up to prevent any further ground water contamination, which we thought would have been seriously threatening if another winter had gone on without those drums being removed.

Mr. ANDREWS. So, to none of your knowledge, none of you had any idea that the political considerations were part and parcel of the speedup of negotiations?

Mr. BONCZEK. No, sir.

Mr. ANDREWS. Is that right, Mr. Topol?

Mr. TOPOL. That is certainly correct from my standpoint. Yes, Congressman, it is.

Mr. ANDREWS. I guess one thing that the chairman mentioned in his questioning and something that has troubled me, and that we have heard from a lot of witnesses, is basically the inconsistencies the train these kind of cases are put upon and how we get, by policy, or regulation, or change of the law, or attitudes of the EPA, into an environment in which these cases are found, negotiations are started, and then they move promptly toward an end.

I don't agree with you, Mr. Topol, in response to your response to Mr. Levitas' questions about these cases are complicated, they take long periods of time. No question about that, but I can't imagine a

circumstance, if your client or other parties involved in a suit, suddenly found that a very aggressive EPA was after them to clean up a site, would not respond accordingly.

I would like for each of you to comment on that and give us—this committee—your thoughts, basically how we move ahead in terms of formulating that kind of policy that moves these cases faster.

Mr. CHU. From a technician point of view it is purely different from Mr. Topol's view, because I do not understand the legal aspects he was discussing in answer to Mr. Chairman's question. As a technician we started meeting in 1980. We did not come to an agreement of how to do this cleanup, how to come up with a cleanup plan, because we cannot move forward with any engineering format without developing a plan first.

We, first, obtained quotations from three cleanup contractors on April 9, 1982. Among the three quotations we start to learn how to do the cleanup. From their quotations—three firms that gave us the quotations, they are Petro Chem, Cannonie, and Chemical Waste Management. And eventually, Chemical Waste Management was selected for two reasons. One, they provide a very adequate explanation of how to clean up so that we understand and push hard, relatively better than the other two. Second, of course, their quotation was the lowest cost of the three. Normal purchasing practice was used.

Now, we were in the process of learning how to do it.

Mr. MOLINARI. Would you suffer an interruption?

Mr. CHU. Yes.

Mr. MOLINARI. Would you identify the other contractors?

Mr. CHU. Petro Chem—P-e-t-r-o C-h-e-m, Cannonie—C-a-n-n-o-n-i-e.

Mr. MOLINARI. And how much were their bids?

Mr. CHU. I think Cannonie had four alternatives ranging from $11 to $15 million, in the ball park.

Mr. MOLINARI. They ranged upward of $15 million?

Mr. CHU. Four different alternatives. And Petro Chem was somewhere a bit more than $10 million. And Chemical Waste's quote at that time was somewhere very close to $10 million—nine point something million. And subsequently, we start more and more argument, that is hustling price, and their price dropped down to below $7.7 million.

Mr. MOLINARI. I'll pick that up later.

Thank you, gentlemen.

Mr. ANDREWS. Mr. Charla.

Mr. CHARLA. Mr. Andrews, I think your question relates to why the case languished. And I don't know why the case languished, but it may be helpful to you if I tell you a little bit about what I observed in the early stages of the case.

As Dr. Chu's statement says, General Motors started getting letters, saying, in effect, "Your XYZ plant or your ABC plant has sent wastes to Seymour." And those letters took approximately 3 months from the time I received the first one until we received the last one, give or take some period of time. And they were addressed all over the corporation; the chairman of the board got one, for example, the legal staff got a couple, and some went directly to the divisions. There was a movement in late 1980 and early 1981, and I

was talking to an assistant U.S. attorney in Indianapolis in late 1980.

In 1981 shortly after the New Year, if my memory serves me, I tried to call them, and I discovered that he had been transferred because apparently there was a very large work load in the Miami area and they needed people down there. And Mr. Goodlowe took over. And I went to see Mr. Goodlowe in April 1981, and there were four or five people there. There was a gentleman from region 5 and I think there were two or three people from EPA in Washington, maybe someone from Justice; I don't recall their names. But during the course of that meeting, which was a cordial meeting, they told me that they had a great deal of information to sift through and that there was a lot of information that they hadn't looked at yet.

Now, I indicated to them at that time that we were willing to cooperate, but that we would like to see what records that they did have. So, it may be—this is only a suggestion—that there was a large volume of work to be done in this case. After that I really don't know what happened.

Mr. ANDREWS. Mr. Topol, you know, I guess in your job as a lawyer you respond to these inquiries, you respond to notices of depositions and interrogatories. You know, IBM was not rushing to settle this lawsuit before the winter came.

Mr. TOPOL. I would like to correct you. Actually, IBM was. First of all, we hadn't been named as a defendant in the lawsuit; none of the generators had been named. We very much wanted to avoid being named as a defendant in a lawsuit. We wanted to avoid getting started with litigation. We wanted to get the cleanup done voluntarily. We thought it was in everybody's interest to get a voluntary agreement, not to get started with litigation. As your question implies, once the litigation cart starts rolling, then a voluntary settlement becomes more difficult. In a sense we were rushing it, and I was under instructions from my client to rush ahead and to see if we couldn't get this thing resolved before litigation; so those were my marching orders in that period of time.

Mr. ANDREWS. Go ahead, Mr. Bonczek.

Mr. BONCZEK. Mr. Andrews, your recent question seems to have an underlying basis that your concern about speed or what was motivation of industry in moving forward to clean up these sites; is that right? Am I right in that, on a general basis?

Mr. ANDREWS. I don't have any underlying motivation, necessarily. I mean, I think you guys responded in kind to, probably, the Government's initiatives. And I'm not trying to imply that you all purposely dragged your feet. I'm more concerned about the overall policy of how we can redirect and concentrate our efforts in a more expeditious manner.

Mr. BONCZEK. If I might make just a few general observations.

Mr. ANDREWS. There is no ulterior motive in my question.

Mr. BONCZEK. OK. I think the prior EPA administration might have been a little bit misdirected in their administration of the Superfund. And I think, rather than trying to get what we call "the shovel in the ground" and get the site cleanup underway, there was probably more effort directed toward trying to establish who was responsible for what and to deal with the legal liabilities as

opposed to dealing with the technical cleanup. I think that is changing dramatically under Mr. Ruckelshaus, and we see a lot of progress being made as far as site cleanups go. As far as I know there have been six sites that have been completely cleaned up, but there are a large, large number of sites that are under some stage of development that are in the pipeline, they are underway.

I think industry has recognized the problem; they are stepping forward on a basically universal basis to try to get these sites settled, and they're trying to dispense with some of the legal problems and get involved as IBM did in this particular case. For example, one thing that is going to be announced to you people is that there is a group that has been put together under the aegis of the Chemical Manufacturers Association, the National Wildlife Federation and Conservation Foundation, and some other interested parties which is going to be called Clean Sites, Inc. This is going to be a private nonprofit corporation whose sole purpose is going to be to try to enhance the speed of cleanups. I guess EPA estimates they're going to be able to clean up roughly 60 sites per year, and what this action is going to be is a supplemental of the EPA action and also, hopefully, to result in getting another roughly 60 sites per year cleaned up.

As I understand, these people are trying to get a meeting with Mr. Levitas and his staff to explain this to the committee at this particular point in time. I think this reflects industry's concern. This is voluntary action which we think is going to do a whole lot of good.

Mr. ANDREWS. Well, just one more comment. I would certainly encourage all of you to let this committee know should you have suggestions; and I mean that not necessarily about this case at all but in an overall view, because those are things we're discussing among ourselves and I think your comments would be appreciated.

Thank you, Mr. Chairman.

Mr. LEVITAS. Thank you very much, Mr. Andrews.

Let me turn at this point to the subject that Ms. Johnson touched on briefly and that Dr. Hirschhorn raised rather extensively yesterday; and that is, is there really a distinction between the surface and subsurface in approaching these problems or, as a matter of fact, shouldn't the entire contamination "problem" or potential be looked at as a whole, and that it is impossible to draw the type of distinction between surface cleanup and subsurface cleanup? That was a point that Dr. Hirschhorn made several times yesterday.

Mr. Bonczek, how do you and Du Pont feel about that?

Mr. BONCZEK. I think there is a logical break between surface cleanup and subsurface cleanup. I think the logical break is, basically, you want to deal with the hydraulic head, you want to get rid of the hydraulic driving force. That is considered the cause and is the potential cause of ground water contamination; once you've taken care of that situation, then you concurrently—or really, not concurrently but subsequently, then you've got to deal with the ground water situation if there is one. And I think there is a logical break point, basically, at least a point of departure, for all site cleanups that makes sense and specifically in this particular situation at Seymour. And that is the way it is broken out.

Mr. LEVITAS. Mr. Hedge.

Mr. HEDGE. I would agree with that. There is a logical break.

Mr. LEVITAS. And Dr. Chu?

Mr. CHU. In my view, I think a project should be viewed as a total project and should be divided into phases. And in case of any site in the future, particularly the Seymour site, you have mass quantity of materials accumulated on top of the site; it has to be removed first, before studying the subsurface condition; otherwise, you are confused; if you have any problem with the sampling technique or drilling technique.

So, it was also proposed by EPA early in 1982. Their project consists also of two phases: phase 1, a surface cleanup, and phase 2, ground water study. So, for this type of situation it should be two separate phases.

Mr. LEVITAS. I think your use of the word "phases" is a very significant difference between what Mr. Hedge and Mr. Bonczek said.

Mr. BONCZEK. I think I disagree with that, Mr. Chairman. I'm not trying to imply that once the surface cleanup is done, that is the end of the program. These remains a ground water situation. I think we envisioned in the Seymour situation that both elements would be taken care of; we took care of the first element and the remaining generators would take care of the second element. Obviously, one without the other wouldn't do any good.

Mr. LEVITAS. Let me ask you this. As I recall the introductory part of the testimony of all three of you each of your corporations has a policy which favors recycling and incineration as opposed to land disposal of hazardous waste.

Am I correct? Is that correct?

Mr. HEDGE. Yes.

Mr. LEVITAS. Now, you hired Chemical Waste Management to clean up this site. What type of disposals were they asked to make of the materials, the hazardous waste materials, that were being removed from the site?

Mr. CHU. Sir, let me try, because I was involved in this development.

We had extensive discussions with Chemical Waste Management, and they tried to present an estimate to be 60,000 drums and the final removal shows only 45,000 drums. There are a lot of estimates when people could be over estimated. Now, of course there are cases that are interesting. Now, the disposal technology is in favor of incineration, but the incinerable material was not estimated to be very high. There are similar materials incinerated by Chemical Waste Management at, I believe, their facilities; the drums are crushed, crushed drums and contaminated soil—or visibly contaminated soil, went to the landfills because it would not be proper to burn the drums or contaminated soil. Sure, Dr. Hirshhorn mentioned about the new technology, thermal treatment of soil. So, we subsequently considered to send some waste, if they can identify which can be recovered, and would consider sending those wastes to Ohio to what is called Solvent Recovery Corp., I believe. And, however, that was a facility initially chemical waste did not list in their work plan. Then they would have to go back to the court to make a request to modify the work-designated facility. And again, as they found, as they believed could be recovered, was so low that

it was not worth this effort, so it was not sent to that facility for recovery but sent down to Alabama for incineration.

At that time, again, it was learned that many facilities can deal with this type of waste. Now, we hope that in the future there will be more facilities, and that will be encouraged. And also, I think people should look hard on the source-containment or at-source solution, such like ground water problem and so forth, that is using an underground solution rather than go with digging 10 foot, 20 foot, of soil, just shifting to another disposal location.

Mr. LEVITAS. Well, what you are saying, as I understand it, is that even though all three of your corporations have policies for incineration and recycling, that in this instance you chose a landfill method of disposal because of the fact that you had drums and soil and you couldn't consider it.

Mr. CHU. Yes.

Mr. BONCZEK. Mr. Chairman, if I may make one general comment, I think we all focused in on sort of a series of steps. We use recycle, destroy when we can. I think, irrespective of the amount of money that we want to throw into a particular situation, irrespective of the state of current technology, no matter what we do, in most cases we're going to wind up with some amount, some irreducible amount, of waste that has to be contained; we can't destroy it further. We can't take something and make nothing out of it, we're going to have to store it in some way.

I think the key in a situation like this is that to some degree—and I'm not familiar with the technical aspects of the particular waste, but—those wastes stay in the directly approved landfill in these kinds of situations. Situations are going to be similar as we go through more cleanups, more sites; there's going to be some amount of waste that just has to be contained, there is nothing else that can be done about it.

Mr. LEVITAS. I understand, at least based on the technology that existed at that time, I think my point, Mr. Bonczek, is that all three of you started out by saying, "We selected Seymour because it was a recycling plant; and we wanted to recycle, so that is where we sent our waste for incineration or recycling. Seymour became a hazardous waste dump; not a recycling center, not an incinerator; it became a hazardous waste site.

Now, how do you dispose of the hazardous waste at the hazardous waste site? Send it to a landfill?

I'm not being critical at this point, I'm just making the observation that, as Dr. Hirschhorn said, what we are doing here is we are reshuffling waste all around the country, we are playing a shuttle game with waste.

Mr. BONCZEK. I think there is a difference here, Mr. Chairman.

Mr. LEVITAS. We're not cleaning it up, we're just reshuffling it.

Mr. BONCZEK. And I think, in this particular case, Seymour was operated as a recycling and an incinerator site. It was not designed as a containment situation. I think the problem it has, as I understand it, was with some of the operational apparatus in the recycling mode which became inoperative to the degree that they wound up with more stuff stored there than they could process in a given period of time.

Mr. LEVITAS. You have seen the aerial photographs.

Mr. BONCZEK. Yes, sir, I have. And I think what we were doing there was getting that material that was basically uncontained—there was no clay liner, there was no leachate collection system, there was no ground water monitoring—getting that material into an approved facility that is capable and competent to handle these kinds of situations as opposed to leaving it in a site which basically didn't have these precautionary devices.

Mr. LEVITAS. I understand. You know, there is a card game—I don't know if you play Hearts—and people try to keep passing the Queen of Spades around so that they don't end up with it. That is what we are doing with hazardous waste. I think that is the point that Dr. Hirschhorn was making yesterday. You can't get rid of it; you've just got to pass it around.

Mr. BONCZEK. I think what we are really trying to do is put it in a place that won't cause a health and environmental problem.

Mr. LEVITAS. And yet, we heard yesterday in Dr. Hirschhorn's testimony, that even the Alabama site, according to a report of the Geological Survey, that there is the threat of permeability, or leaks, or cracks in the clay at that site, that there is no such thing, really, as an impermeable soil to the extent that we can assure that if we just put it there we won't have to live with it.

Mr. BONCZEK. I think that is right. I think, Dr. Chu has already said earlier, we can't ever prove the negative, what we have to do is take all the precautions possible. And in those situations where there is, for example, some degree of leaching either through an artificial liner or through a natural clay barrier, what we do is we set up monitoring wells on the periphery so that if anything does happen we'll know about it and then we can establish collector wells, pump the stuff up, and treat it.

Mr. LEVITAS. As this subcommittee must, looking at the broad picture. We are focusing in part on Seymour and are using Seymour as an example. The problem seems to be the reshuffling of hazardous wastes around America, and we need to do something more than simply reshuffle it. And pretty soon we're going to run out of places to reshuffle it to. We're going to run out of alternative water supplies to make up for capped and forgotten, poisoned aquifers; and we'd better start looking at some alternatives. And the reason Seymour is such a good example—again, I am not being critical—you have told me your corporate policies are to incinerate and to recycle, and that is exactly why you picked Seymour, but at the end of the line, where did it end up? For whatever reason it ended up in a landfill. And what we are trying to figure out is how you break that chain.

Dr. Chu, did you want to say something?

Mr. CHU. I just wanted to point out, first, of course, if something cannot use an incinerator and if there is a risk that is hazardous, then, of course, since we have only three places, air, water, and land it can go—air, water, and land.

Mr. LEVITAS. Space.

Mr. CHU. Yes. That was one of the places I presented at an NIH conference, talking about sending a rocket out. Of course, you have to say that rocket would be 100 percent safe and will not turn back on me.

Basically, I would see in the future that people fully in favor of an in-situ solution. The shifting from one location to another location, not only the shifting problem you are talking about, but also involves a transportation risk. If such a solution can be accomplished, leaving this material there and you have to take care of the problem at that site and then you would avoid the transportation problem. You avoid this shifting locations. And I think there is a lot of knowledge to go toward that direction.

One of the things Dr. Hirschhorn mentioned yesterday about this New Jersey example, I think—I believe—he gave you the details that would mean there is a process which includes ground water pumping, and then treatment, and then the reinjection of water. I believe that was the process he was mentioning.

Mr. LEVITAS. OK, I just have another brief series of questions directed to the settlement, Mr. Topol, that I think you can help us with. And my guess is that when we hear from the other witnesses, after you, we may get a different perspective of their view of the settlement, and cleanup, and so forth. But let me ask you a question.

We're going to hear one of the witnesses this afternoon—the one we're going to hear from is Monsanto. They did not participate in the settlement. Were they invited to participate in this at all?

Mr. TOPOL. Yes, they were.

Mr. LEVITAS. What we call the "small group of generators." It sounds like Dartmouth College; it's a small college but we love it, you know.

Mr. TOPOL. Yes, Mr. Chairman. In fact, Monsanto Chemical Co. was explicitly invited, personally, by me, sitting down in a meeting with counsel for the company and asking him if they wanted to join the small group at the time it was being organized. I made about one-half hour, 45-minute, presentation to the attorney for the company. I told him that I needed to know by I think it was the following week, 7 days later. He indicated he would get back to me in that timeframe. He called me back the day before the deadline and informed me that Monsanto did not wish to join the group.

And at a subsequent point in time when we were in the final stages of negotiating the thing, the agreement, I got a call from, I believe, the same attorney of Monsanto, asking if they could still join the settling group. And at that point—and this was very close to pulling the thing off—it was not possible, because the Government imposed the 50-percent requirement and we were bumping up against that 50-percent requirement.

Mr. LEVITAS. Suppose, when you sent out your first invitation for what is known as the—became known as the—IBM/Topol group proposal, everybody had said, "that is a good idea, we want in." What would you have done at that point?

Mr. TOPOL. Actually, we didn't send out an invitation, Mr. Chairman, we really called companies. We went on the basis of going from the top down. Our operating premise was the one that the Government had set, "you can't get more than 50 percent volume." And, so, we really did—It is a little like putting together a party; you know, you can only get a certain number of people. So, essentially we contacted some. To the extent we got a refusal, then we would move on to somebody else; but we never wanted to be in a

situation where we had asked somebody to join and then find out we had too many people in the group. So, it was really through personal discussions to avoid that problem.

Mr. LEVITAS. After you put your group together, the small group of generators, were there any nonparticipants in the IBM/Topol group who called up and said—other than Monsanto, which you just described—that called up and said, "We want to be part of that action"?

Mr. TOPOL. No. There was no one that called up.

And I should point out two things. One is that the Government, in that meeting in Indianapolis, September 10, indicated that companies would be able to cash out on a pro rata basis of their volume times $30 million. And since our group had the minimum amount of money, many thought that that would be a less favorable way to go.

But to answer your immediate question, nobody called up and said, "Yes, we are prepared to pay the minimum of $100,000 or we are prepared to pay our share, whichever fits," and was refused from the group.

Mr. LEVITAS. And other than the people that you notified, so far as you know nobody else even knew that the group was being put together until it was announced in September?

Mr. TOPOL. No. I don't know that that is the case. I guess I've been in this town too long, like you, to believe that anything is not known. While we were negotiating with the Government, we viewed those as confidential discussions because they were settlement negotiations, but certainly I would expect people were talking with other people. And, at the very least, we didn't start negotiating until after Labor Day, and the Government had their meetings in Indianapolis September 8 and 9, or 9 and 10, and my recollection is that the subject of these negotiations was disclosed by Carol Green.

And I should add one other thing: There was a letter that went to all of the larger group of generators, to my recollection, in early August, in which they were explicitly advised that there was a possibility of a small group of generators negotiating with the Government; so, there was advance notice.

Mr. LEVITAS. And when was the, so far as you know, outside this group, the first disclosure made of the amount to be involved?

Mr. TOPOL. With respect to the amount, I don't know; because we really weren't negotiating an amount. We really didn't have the amounts locked in until the end of the deal, our agreement with the Government. We were negotiating on two tracks, legally, to hammer out the agreement, and our obligation was to do the work. There was a second track, a technical track, as to what the work was, and then we put the contract together with it. So, the bottom-line price really didn't emerge—the two tracks really didn't merge—until the end of the process, Mr. Chairman.

Mr. LEVITAS. And so, therefore, no one would have known what sort of—whether they were getting a good, bad, or indifferent deal until the end, in dollars?

Mr. TOPOL. I think they wouldn't know what the precise amount of money they would be paying was until the end, that is right.

Mr. LEVITAS. On page 17 of your testimony, you make reference to that there were several smaller generators who wanted be included and a minimum of $100,000 was set for each of them. Will you furnish us a list of those generators?

Mr. TOPOL. That list would be attached to—it is exhibit A to the consent agreement.

Mr. LEVITAS. To the consent decree?

Mr. TOPOL. That list, the people who went into it at $100,000.

Mr. LEVITAS. And were there any additional ones who wanted to get in that did not, smaller ones that did not make it?

Mr. TOPOL. That wanted to pay $100,000?

No, there weren't Mr. Chairman. But as I indicated, they had an alternative of settling for a lesser amount of money by accepting the Government's pro rata offer.

Mr. LEVITAS. Did you make the decision that $100,000 was the minimum?

Mr. TOPOL. The decision that $100,000 was the minimum was made at a meeting of a group of companies involved in the 24 that took place, my recollection is, late August 1982 timeframe. There was some discussion about it. Actually, I wanted $150,000. The question, really, of setting the minimum was the practicality of how to form the group quickly, yet live within the Government's 50-percent requirement. We didn't want to contact 360 generators. We wanted to get the job done in a reasonable amount of time. We had to live within the Government's 50-percent figure and we knew that smaller generators wouldn't be attracted to our arrangement because they had an alternative of the Government's cash-out.

Mr. LEVITAS. The pro rata?

Mr. TOPOL. The pro rata.

Mr. LEVITAS. You're approaching the question, really, that I want to ask, and to discuss with you. And follow me, if you would.

Since you were putting your deal together at the same time the Government was putting its pro rata offer together, it must have become apparent that the surface cleanup would be accomplished for less than $15 million that EPA estimated, and on which they were applying their pro rata, and that each company that would be involved would have to pay less than they would have if they had cashed out using the EPA pro rata approach. Isn't that a fair statement?

Mr. TOPOL. I think that is a fair statement.

Mr. LEVITAS. If that is correct—and I think it is, I think it is pretty obvious—in a sense the $100,000-or-more club that was put together found that they would be able to get out of the cleanup for less than others would have to pay who were cast into the pro rata group.

Mr. TOPOL. The difference being, Mr. Chairman, that our group undertook the responsibility to plan this project, to get it organized, to get it funded, to get it managed, to get it designed, to deal with the contractor that was to set up a mechanism to run the job and to get the job done for the Government.

Mr. LEVITAS. Let's assume for a moment that IBM, just to use one of the leading participants in the group, because of a variety of reasons was not the belle of the ball in the sweetheart deal; that they were leaders, but they had put a lot of money in, and if there

was a sweetheart they weren't the sweetheart—or they were not the beneficiaries of the sweetheart. But surely the $100,000-or-more club really were sweethearts in this operation as compared to those on the outside in the pro rata group.

Mr. HEDGE. If I understand your question and Allan's response, most of the small generators who contributed $100,000 would have paid less under the pro rata group.

Mr. TOPOL. Certainly some of them would, Mr. Chairman, I believe. At least there are a couple on that list who would have paid less.

Mr. LEVITAS. Well, United Technologies, $350,156 is the amount they actually paid. And wouldn't they have paid substantially more had they been part of the pro rata?

Mr. TOPOL. Yes, they certainly would, Mr. Chairman.

Mr. LEVITAS. And there are several others—Atlantic Richfield, Anaconda—I'll not read down the whole list.

Yes, Mr. Charla then Dr. Chu.

Mr. CHARLA. The companies who would—who may—have been able to pay less would be at the bottom of that list. I think the first $100,000 corporation is Penwald, and from Penwald down to Waste Resources of Tennessee, there are six or eight companies that paid $100,000. And I think Mr. Topol is correct: some of those companies could have gone into the pro rata group and paid considerably less than $100,000 but were willing to pay to join the group of 24.

Mr. LEVITAS. Dr. Chu.

Mr. CHU. OK. I would like to follow up on Mr. Topol's point, that we did see, the quotes were received—someone did quote very close to $15 million for the same work. But we eventually negotiated to a lower price. And we think this may not be always true in any other future sites, but in this case we were able to go through the proper negotiation, contracting negotiation procedures, to accomplish a job which would have cost $15 million if we had chosen the highest bid. But we did choose a lower bid, so we have accomplished the same work at lower cost in just the normal process.

Mr. MOLINARI. Would you yield for a question to Dr. Chu?

Mr. LEVITAS. Yes. I yield to my colleague.

Mr. MOLINARI. Isn't it a fact that if you remove 5 feet of soil, as was originally indicated in the EPA request, that the total cost of cleanup for the 24 settlers would approximate $15 million?

Mr. CHU. Yes. If the additional 4 foot represents $4-some million. That would be true.

Mr. MOLINARI. It would be just about $15 million, wouldn't it?

Mr. HEDGE. I think the arithmetic is approximately $11 to $12.

Mr. CHU. Yes, $7.7 million and $4 million would be $11 million.

Mr. MOLINARI. I'm talking about the total spending by everybody, including the $1.2 million by IBM that is factored in. We have a figure here of $10 million plus and if you add $4 million to that, you come up with a total expenditure of approximately $15 million.

Mr. LEVITAS. One of the companies, Mr. Charla, who were in the $100,000-or-more club, was called Waste Resources of Tennessee——

Mr. CHARLA. Yes, sir.

Mr. LEVITAS [continuing]. Which was an affiliate of Chemical Waste Management.

Mr. CHARLA. That is correct.

Mr. LEVITAS. Now, my understanding is that they paid $100,000; and yet, if they had cashed out under pro rata they would have paid $15,000.

Mr. CHARLA. I'm not sure of the arithmetic, but I think your principal is probably right.

Mr. LEVITAS. Yes, Mr. Topol.

Mr. TOPOL. I think they were a very small generator; that's correct.

Mr. LEVITAS. What incentive would cause them to want to pay $100,000 instead of $15,000?

Mr. TOPOL. That company was a wholly owned subsidiary or division of Chemical Waste Management that was doing the job. As we began the negotiations with Chemical Waste Management, Chemical Waste people told us that they had a sub or company that they had acquired, this Waster Resources of Tennessee, that was one of the generators at the site, one of the 360.

And they were included in the consent decree and paid the $100,000, really, for two reasons. One, from our standpoint and the Government's standpoint, we wanted that, we wanted Chemical Waste to be a defendant and a party to the decree, and, therefore, subject to the court's jurisdiction for policing the consent decree since they were doing the cleanup. And this was a legal mechanism that permitted us to do that, to have them named as a settling defender. In addition, since they were doing the work and participating in the work, they wanted to get a release from liability for the waste they had contributed in the past. And it is those two things. Now, they could have gotten the release under the Government's pro rata offer and have accepted that, but that wouldn't have served our purpose and the Government's purpose, both, of having them be a party defendant subject to the court's jurisdiction for purposes of the consent decree.

Mr. LEVITAS. All right, the last question, to Mr. Charla, Mr. Topol, and Mr. Berman: Have you given any consideration to the possibility that the consent decree might be subject to collateral attack or could be set aside by action of the nonsettling parties?

Mr. CHARLA. I have heard the possibility discussed. I have not given it a great deal of consideration, sir.

Mr. LEVITAS. You have not researched the addition?

Mr. CHARLA. No.

Mr. TOPOL. I have given the thing some thought, Mr. Chairman, and I think it is extremely unlikely that it would be set aside; the reason being, which was why we wanted a consent decree mechanism, was that there was a full and open public hearing. People filed comments. Those all went to the judge. The judge sat in court and said, "Anybody who wants to participate can participate, anybody who wants to intervene can intervene. The Government said, "We have no objections to intervention."

There was no formal intervention. There were extensive comments, there were extensive arguments. Having come through this process, I guess it is my judgment that there is either collateral estoppel, or res judicata, and that the decree could not be reopened.

Mr. LEVITAS. I don't know about the other corporate parties at interest, I just speak for myself after listening to the EPA and the State explanation and the citizens.

This woman who was invited to participate at that settlement hearing, I got the feeling that in terms of the public they really were not given real notice and full opportunity. I mean, they were given a pro forma notice, a nominal opportunity, but I didn't get the sense that they really knew what it was all about.

Now, Mr. Berman, what about yourself?

Mr. BERMAN. Yes. I have not studied the matter extensively either, but I would agree with the comments that each of my colleagues made. But I think that the perception you've just expressed, Mr. Levitas, was the one shared by the judge in the U.S. District Court for the Southern District of Indiana. He was concerned that the 10-day shortened notice that the Justice Department gave was inadequate. And I think that was the principal motivation the judge had in having 2 days of hearings before his own court, and I think he took great pains to make sure that that decree was, indeed, frankly unassailable. I think he offered on repeated occasions, to each of the parties who expressed concern or made any semblance of a complaint, the opportunity to formally intervene and appeal his judgment, if necessary, to make sure that the issues were fully aired.

Mr. LEVITAS. Thank you very much. We are going to, obviously, be asking similar questions to our next panel of witnesses.

Mr. Molinari.

Mr. MOLINARI. Mr. Topol, somewhere in prior testimony or memoranda, we've gotten information that Waste Resources of Tennessee was a defunct company. Either it or its parent corporation was insolvent or had been declared bankrupt. Could you enlighten us as to that situation?

Mr. TOPOL. I can't. As I say, the only knowledge that I have is that when we were working with the Chem Waste people they said, "We happen to own a subsidiary." This was a mechanism to get them under the decree. But what the situation was as to them being bankrupt or not or how they were acquired, I'm sorry, I can't help you at all in that, sir.

Mr. MOLINARI. When the money was put up, each of you tendered a sum of money to a joint trust account; is that correct?

Mr. TOPOL. That is what happened. We set up a trust account at a bank in Indianapolis, and there were four trustees: IBM, General Motors, Cummins Engine, and the bank. And those four administered the funds. The funds were promptly paid in and that was the mechanism used to pay contractors.

Mr. MOLINARI. If the information that we've received is accurate, that this Waste Resources of Tennessee was insolvent, bankrupt, or had some financial problems, they would have had to come up with $100,000, as I understand it.

Mr. TOPOL. They did. As I understand it, they did. And I have an understanding that they were, at the time of the decree, owned by Chemical Waste Management and that Chemical Waste Management paid the $100,000.

Mr. MOLINARI. The check that was issued was actually issued by Chemical Waste Management?

Mr. TOPOL. I don't know that.

Mr. MOLINARI. It was not?

Mr. CHARLA. I don't know, sir.

Mr. MOLINARI. Do any of the trustees here know?

Mr. CHU. Only the bank trustee knows it.

Mr. MOLINARI. Only the bank trustee?

Mr. CHU. The bank trustee handles all the checks. They saw the check. I did not see the check.

Mr. MOLINARI. Would I be correct, Mr. Topol in that if you were a settling party, the check would have to be issued by that settling party or in the name of that settling party?

Mr. TOPOL. In this particular transaction, I would think that would be the normal way to do it; but I don't—I mean, I'm not sure that it would have been a problem had the check been from somewhere else to the bank and they said "This is payment" for somebody else's share. I didn't hear that that happened. I think probably I would have gotten a call and been asked about it, but I don't see where that would———

Mr. MOLINARI. Someone could have raised the question, would they not that it might have been an ultra vires act of the corporation?

Mr. TOPOL. They might have; but if it was a wholly owned subsidiary of Chem Waste Management, I don't think that they would have raised it.

Mr. MOLINARI. If it were Chemical Waste Management's.

Mr. TOPOL. Right. If the check came from Chem Waste Management and they said "this is to cover the contribution of Waste Resources," I don't think that would have raised a problem for the trustee.

Mr. MOLINARI. Let's go back, Mr. Topol, to page 14 of your testimony, where you talk about extensive negotiations by a large group of generators. There is an amount of money that was pledged by that large group toward the cleanup but then it was rejected by the U.S. Government as insufficient.

Can you tell us how much was pledged at that time?

Mr. TOPOL. Sure. We really went at it in two installments; I mean, we made two efforts. In the first effort, the theory was that the generators would pay their contribution which would be $4.5 million in total, but it would be based on a pro rata basis. And when the solicitation came in, we only had $2.7 million—or the committee only had $2.7 million.

The theory of that offer was that the remainder of the amount of cleanup should be paid for by two additional sources: one by the State of Indiana because they bore responsibility, they had licensed and permitted and oversaw this entity; and the second, by the owners and operators of the site whom we believed had assets, or at least a related corporation did. So, essentially, in offer one, the large group of generators was offering to tender $2.7 million to the Government in return for the total release from all liability at the site. In the second fund raising, which was limited just to a surface release, the amount of money raised came in in the neighborhood of approximately $4 million. I don't remember—I remember that was $4—something; it was in that neighborhood.

That amount of money was then offered to the Government and also rejected as insufficient. That was the level of the fund-raising in those activities.

Mr. MOLINARI. I think the record indicates that IBM spent something like $1.2 million in voluntary cleanup. Now, during the negotiations, Mr. Topol, was not the question raised: that your client had already participated to the extent of $1.2 million in cleanup at the site, in good faith, and should be entitled to a credit for that amount when you were assessing everybody for their pro rata share?

Mr. TOPOL. It was. And if you don't mind, Mr. Congressman, I would like to let my client respond on that point.

Mr. MOLINARI. I assume as a good lawyer, Mr. Topol, you would have covered that question, but I would be glad to hear from Mr. Hedge.

Mr. HEDGE. It was raised but it didn't sell.

Mr. MOLINARI. It didn't sell.

Mr. CHU. We supported it.

Mr. MOLINARI. I'm surprised. With Mr. Topol in the picture, I would have thought you would have met with some measure of success.

Mr. TOPOL. Well, let me say it was my colleagues who decided it. I was all too happy to have IBM get a credit as part of the settlement, but my colleagues within the group of 24 didn't look too favorably on that. We quickly reached a bottom line of——

Mr. MOLINARI. I would assume that whether IBM paid that $1.2 million or whether the total group had to go out and cart it away probably would have cost around the same figure, and maybe that was contentious. But why would anybody have raised objection?

Mr. TOPOL. Well, because the less we paid, the more they paid; and we reached the judgment that if IBM would have insisted on getting its $1.2 million credit, we would not have ended up with the package to do the job.

Mr. MOLINARI. You are anxiously waiting. Go ahead, Dr. Chu.

Mr. CHU. I would say that Mr. Topol may remember, both Mr. Charla and I supported the concept that credit should be given for the work done by IBM.

Mr. TOPOL. That is true. I had forgotten that.

Mr. MOLINARI. You did have some friends, then. [Laughter.]

Mr. TOPOL. We did have some support; not much, but some support.

Mr. MOLINARI. I believe a great deal that we've heard today about the major corporations with good reputations wanting to get out there and do what was right because of the environmental problems that they faced at the site. However, when you are assessing whether to go forward with a settlement or not, it would seem to me that you would have to balance in your own mind, based on a professional consultants, what it would cost you to be included in this group of 24. Conversely, if you excluded yourself from phase 1 whether it would have cost more to get included in phase 2. How was that decision reached by those corporations that are represented at the table here? It is a fair statement to say that you made an assessment based on what it would cost for phase 1, versus what is it going to cost for phase 2?

Mr. CHARLA. Speaking for General Motors, sir, we were committed to the idea of settling as early as possible. And I would like to point out that during the negotiations, even after we had committed to the group of 24 and committed before that to the much larger group, that during negotiations we did not know how much we were going to pay, because the dollar figures kept changing, almost day by day, as the technical group continued to meet with this contractor or that, and proceeded to evaluate what was going on. So, it really was not until maybe a week or 2 or 3 days before we finally presented our option to the Justice Department, that we even knew what we were going to pay.

Mr. MOLINARI. Well, the testimony we heard before was that you didn't know the exact figure.

Mr. CHARLA. That is right.

Mr. MOLINARI. I think Dr. Chu indicated before that you had a ballpark figure.

Mr. CHARLA. Ballpark figure.

Mr. MOLINARI. You might have been a couple of million dollars off as far as the total sum.

Mr. CHARLA. But we did have a final figure.

Mr. MOLINARI. But you didn't have any idea and you still don't have any idea what the phase 2 settlement will cost?

Mr. CHARLA. No. You've had testimony on that.

Mr. MOLINARI. Mr. Hedge.

Mr. HEDGE. I would comment on that, Congressman, by giving you a set of numbers, one that you already have in the record; that was the $1.2 million voluntary cleanup. As to IBM's pro rata share that Mr. Topol talked about, how the various payments of the 24 were arrived at. If you took the percentage of volume that we shipped to Seymour, our pro rata share would have been approximately $1 million in that settlement of the 24. We actually put up $2.2 million. So, we actually spent in cash between the voluntary settlement and what we put up for the group of 24, $3.4 million. Our pro rata share of the actual cost of the surface cleanup, $7.7, plus the Government's worst case estimate of $15 million for subsurface cleanup, a total of $22.7 million, would have been $3.2 million.

Financial considerations were not our motivation in this deal. Our motivation, again, was environmental, to get the site cleaned up, as the others have commented.

Mr. MOLINARI. Obviously, you are in a different position than the other 23, at least as far as testimony that I heard, if I heard correctly.

Mr. BONCZEK. I might add that Du Pont's situation is similar to that. We had been able to establish through records at the site that 94 percent plus of our wastes were, in fact, incinerated. And therefore, Congressman, we are not causing the problem. If you had redone the arithmetic on that, our share would have been $40,000 rather than $682,000. As IBM has indicated, our motivation was environmental. We did want to get the site cleaned up and we were willing to forego legal and factual defenses just like the other two parties here were in the spirit of compromise.

Without that, if we were to start arguing about what was left and talking about degree of hazards, another very complicating

factor, we would still be sitting here discussing the situation and those drums would still be on top of the land.

Mr. MOLINARI. I would allude to the testimony yesterday from Dr. Hirschhorn. He doesn't use the term "worst case estimate." What he says is that subsurface cleanup would run, in his judgment and in the judgment of OTA, between $20 and $40 million.

Mr. CHU. It appears that the experts rarely agree among themselves.

Mr. MOLINARI. I can agree with that.

Mr. Charla.

Mr. CHARLA. I would just like to make one additional point. We didn't have that OTA figure in front of us at the time.

Mr. MOLINARI. I understand that. I am fully aware of that.

Mr. Hedge.

Mr. HEDGE. I would like to make one comment. I know of no data on which that estimate is based. I think that's what the EPA tried to establish with their monitoring program at Seymour. Now, how they do that is crucial.

Mr. MOLINARI. Well, it appears to me to be a range based on the available evidence at this point in time.

Does anyone here, starting on the right-hand side of the table, want to give a ballpark estimate based on your studies and your involvement in these things as to what the subsurface cleanup is going to cost?

Mr. BONCZEK. Again, it is very difficult, if not impossible without looking at the technical facts on a case-by-case basis. These things are going to range, I suspect, when we get through with a number of these Superfund cleanups, from situations where people say the best thing from the ground water standpoint is to do nothing—for whatever consideration—either because there isn't significant contamination concentration of an aquifer for remedial action or if the aquifer is already contaminated it isn't used, or whatever—a number of considerations where you could run into situations where it may be a major aquifer moving at a very rapid speed that is used as a drinking water source for a number of people which has got to be cleaned up to something approaching drinking water standards. That's going to be a very difficult and a very expensive consideraton. To throw out ballpark numbers, I think, would be doing you a disservice.

Mr. TOPOL. I'm going to plead being a lawyer instead of a technical individual, Mr. Congressman.

Mr. MOLINARI. I can understand that.

Mr. HEDGE. I agree. I don't think we have the data to make an estimate.

Mr. MOLINARI. Is that $20 to $40 million a possible range?

Mr. HEDGE. Anything is possible, Congressman.

Mr. MOLINARI. OK. Mr. Berman.

Mr. BERMAN. I would just direct the committee's attention to the report that the EPA has recently issued entitled "The Superfund Task Force Preliminary Assessment." In that report they attempt to answer the very question you are asking, looking at the 1,600 to 2,000 sites they estimate may require cleanup. They have estimated what percent of sites they believe will require some ground water

remediation, and the average "worst case" ground water clean-up costs.

Mr. MOLINARI. Now what was the estimate? $7 million; $8 million?

Mr. BERMAN. Well, the total numbers for cleanup of these sites, including surface and ground water, was in the $11 to $12 billion range.

Mr. BONCZEK. Million dollars.

Mr. BERMAN. Billion. Total for all of the sites. On a cost per site basis, my recollection is that they average around $6 to $10 million per site in total cleanup costs for these 1,600 to 2,000 sites.

Mr. CHU. I thought I should report to you that early in 1983, a consultant working for one company at that time, asked me about the question you just asked this group. And I said that a ball park estimate for me is about $300,000 for water supply. In the worst case, if you did find ground water contamination, I would say less than $1 million. That is a ground water pumping program and city drinking water supply, normally I would say a few hundred thousand dollars—not $1 million.

But I would say that if you want to cover yourself for a lot more monitoring you have to need maybe a million. So my estimate at that time, early in 1983, was somewhere in the range of $1 million.

Mr. MOLINARI. Are you talking about removal, as well?

Mr. CHU. No. I do not support soil removal projects because the shifting. It's a very important point and we talked about that many times, and I think that the proper approach, if you find that ground water is contaminated, you can install wells to pump ground water. Ground water flows very slow. A small water treatment plant can be installed and at about several hundred thousand dollars, and then you can treat water to a quality that is good enough for agricultural use or surface water discharge. Therefore it should not cost more than $1 million.

Mr. MOLINARI. I sure hope you are right, because we have a lot of these problems throughout the country. The figures we have heard are far in excess of those optimistic figures that you are giving.

But one question and—I notice, incidentally, in your testimony, Dr. Chu, you don't believe there is going to be any significant contamination of the ground water?

Mr. CHU. Yes. The site was shut down starting in 1980. So we've had more than 3 years and if we assume a plume of contaminants exists it hasn't reached anyone's well to cause any significant problems yet.

Now, the end of this pushing force of concentrated waste has been removed. So the first conclusion you can have is that it moves very slow. It hasn't reached you yet. And once you reach the point that you have to have a ground water pumping program, it may take you 5 years or 10 years until the whole end passes. If it moves that slow, the whole thing is gone. I don't think there is a big problem.

Mr. MOLINARI. Well, I find your testimony interesting because on the one hand we are being told that there is really not much of a problem, and if there is contamination, it is not to cost very much. On the other end, other witnesses have said: "We cannot give you

even a ballpark estimate because you have to have technical testing done in order to evaluate." So, I have a problem trying to determine if you are correct.

In the event that there is contamination, I do know the groundwater table moves slowly and can be reached and the solution you are suggesting can be done. On the other hand, we've heard other witnesses say that they wouldn't even hazard a guess because it would take extensive testing before they could decide how much it would cost to clean it up by whatever standards.

Now, there was a point in time during the negotiations where EPA had said they wanted 5 feet of soil to be removed as part of that settlement. I notice, Mr. Topol, that you have indicated that you negotiated in part with EPA technical people to reduce to writing the scope of the work to be done on the surface cleanup. You say on page 20 that each paragraph of the *Seymour consent decree* was hard fought, at length, not only with the Government, but among our group of 24.

How was the original requirement of a 5-foot soil excavation eliminated to the point that we just had "hot spot" pockets removed, instead.

Mr. TOPOL. Let me, if I can, respond on the level of the overall scheme of the negotiations. And I think Dr. Chu may be able to add a little bit to it. First, my recollection is that 5 feet of soil removal was never insisted on by the Government. It was never part of our proposal. It was never in negotiations with the smaller group. As I said, what we were running was two parallel negotiating tracks in the timeframe September and October.

There were legal negotiations about the consent decree itself—the paragraphs of the decree. Each paragraph was the subject of intensive negotiations on the decree. The legal language of the release and the whole nature of the thing. At the same time, there was a second track of negotiations going on among industry technical people, representatives of the 24, EPA technical people, and joined by Chem Waste, to some extent. And what they were doing was hammering out an agreement on the thick booklet that became exhibit B. And that booklet described what soil had to be removed. We wanted to have a clear document so there wouldn't be any dispute.

I didn't participate in those discussions. I think Dr. Chu did—of that second group—and I'm going to let him talk to those. But my understanding of the overall thing is that we never started with the position where EPA said you have to remove five feet. We started with the position that we will do some soil removal, and how much would be a subject of discussion, negotiation, agreement among the technical people. That is the overall framework. And perhaps Dr. Chu can add the specifics of the negotiations.

Mr. MOLINARI. To try to save some time, my recollection is that the statement from OTA was that it was an EPA study that recommended the removal of 5 feet.

Mr. TOPOL. It may have been a study of, you know, an agency committee. But by the time we came to negotiate—I don't know what point in time that was made—that wasn't the position they were insisting on.

Mr. MOLINARI. The way I recall the testimony is that EPA had a study which indicated that 5 feet should be removed. I'll read it to you verbatim:

> The agreement which EPA entered into sanctioned removal for only one foot of soil for only 58 percent of the site for a total of 14,300 cubic yards at a cost of $676,000. However, an earlier EPA report estimated it was necessary to remove five feet of soil from the 13 acre site for a total of 105,000 cubic yards at an estimated cost of $5 million.

Now, it goes on to say:

> The 24 generators commissioned the study that supports the removal of about 15 percent of what EPA contractors thought necessary.

But there were apparently no actual data to support this position. That is the testimony of Dr. Hirschhorn yesterday. Now, is he correct or incorrect?

Dr. Chu.

Mr. CHU. I have never seen any EPA document that supports the 1 foot or 5 foot. We have documents that support how clean in clean—1 foot or 5 foot or 6 foot or 10 foot. The removal of visibly contaminated soil is a negotiation, and I always believe some kind of containment will be better off if the soil is contaminated. Eventually in was set up for one foot. I never did see that 5-foot justification.

Mr. MOLINARI. Is it correct that you commissioned a study yourself?

Mr. CHU. No, sir. No, sir.

Mr. MOLINARI. You didn't have a study?

Mr. CHU. If Dr. Hirschhorn has that information, I would like to have it.

Mr. LEVITAS. If the gentleman will yield.

Mr. MOLINARI. I will be glad to yield.

Mr. LEVITAS. I would simply refer again to that document of September 7, 1982, that I made reference to earlier—the EPA document in which Mr. Burroughs makes the point that:

> Soil excavation indicated that the site excavation plan would be modified based on an updated aerial photograph of the facility. Since this may substantially affect the site excavation plans, the new information should be examined carefully.

Which would indicate to me that both somebody in EPA and outside of EPA knew that something was being modified. There had to be something there that was being modified in order for that statement to have any significance whatsoever. And I think Mr. Molinari is trying to find out who knew what and when did they know it.

Mr. CHU. Let me follow that point. What I said was that there was no document to justify how clean is clean and why it's 1 foot. There is document to indicate 1 foot will be removed. I want to make that clear.

Mr. LEVITAS. Mr. Topol.

Mr. TOPOL. You know, Mr. Chairman, I don't know who was making note of what was being modified. One thing that was being modified was that big book that became used to spell out how much soil—undoubtedly we have that book which says something about soil. And these were subjects of negotiations and maybe the agency thought it would be enough. When an aerial photograph was taken, it was decided how it would be modified. So it's possible,

you know, that that was the document being modified. That is where it was thought up.

Mr. LEVITAS. Mr. Hedge.

Mr. HEDGE. I was just reminded—I'm not certain of my recollection—but I believe of the three contractors that Dr. Chu talked about earlier, too, Petro Chem and Chem Waste, at different stages in the technical discussions were asked as to what would be involved in surface cleanup. And I think one recommended 1 foot and one recommended 2 feet in their proposals. I am not certain of that, but I think that is how it was—my recollection—and it may have been a basis for the technical discussions coming up.

Mr. MOLINARI. I think it is surprising when we hear that one is recommending 2 feet when the question is whether 5 feet is appropriate. Wouldn't the corporations seek to cut down the soil to be removed so that their competitive bid would be lower and therefore they would get the job.

Mr. CHU. That's possible. But I don't recall.

Mr. MOLINARI. Based on what Mr. Hedge said, if one contractor put a bid in based upon 2 feet and the others put bids in based on 1 foot, obviously the company recommending 2 feet is going to be coming in with a higher figure. At least I would expect so.

Mr. HEDGE. I think at the point of the final negotiation—it was the technical group that was telling the contractor what they in the Government wanted. And then that relates to the point earlier that the final price wasn't established until the last hour as to what the cleanup would cost. So that——

Mr. MOLINARI. I think, Dr. Chu, that Chemical Waste put in an original bid of $10 million.

Mr. CHU. $9.8 or something in there—something very close to $10.

Mr. MOLINARI. $9.8 million.

Was the final figure $7.7 million?

Mr. CHU. I think $7.6 or $7 something. It's less than $7.7 because we needed the money for other purposes.

Mr. MOLINARI. So they dropped their bid by better than $2 million. In dropping the bid by $2 million, was there less work to be done by Chemical Waste in consideration of the reduction of the price?

Mr. CHU. Yes. The original bid included demolition of existing buildings. The buildings we discussed—there was no need to remove those buildings. Those buildings are still there. And that was one I remember. Maybe there are some other things, but yes. The work was different.

Mr. MOLINARI. Does anybody else have any recollection to account for the difference?

Mr. TOPOL. I don't.

Mr. HEDGE. I don't. Except to say that obviously there was a change in the scope of work with regard to the building. I think the first number that Dr. Chu gave to you was an estimate on the part of Chem Waste. It was not a firm bid. The technical group was going out to these potential vendors and saying, you know, given a broad scope of work like this, what would be your estimate. And obviously, the first number you are going to get from any vendor

under that kind of discussion is going to be higher than the one you actually negotiate.

Mr. MOLINARI. How many firm bids were submitted?

Mr. HEDGE. In fact, there were no real firm bids down to the final negotiation with Chem Waste.

Mr. MOLINARI.

I'm sorry, Dr. Chu, did you want to say something?

Mr. CHU. The bids changed. As the scope changed, the bids changed.

Mr. MOLINARI. I just have a couple of simple questions Dr. Chu. When you talk about approved General Motors disposal facilities, can you identify some of them for us. How many might there be?

Mr. CHU. First I would like to mention that GM's program is different from IBM's in that our program does not have formal approval by the corporation. But rather we set up guidelines for the plants and divisions. The contractor must ensure the facility is a currently licensed and operating facility. They will choose the facility. We do not approve or disapprove. There is a problem with that program for a company of our size in that if I approved today—such as I did in 1976, fully approve the Seymour site—and if I did not followup at the same site everyday, then I might have given an approval which might give the people false security.

Therefore I do not have a corporate approved facility number to give to you.

Mr. MOLINARI. What you are saying is that it changes all the time?

Mr. CHU. Yes, sir.

Mr. MOLINARI. It wasn't the monitoring activity of General Motors?

Mr. CHU. Of the plant.

Mr. MOLINARI. Dr. Chu, on page 4, you indicated that representatives of the GM Division went to the site to search for drums that might contain GM waste.

Mr. CHU. Yes.

Mr. MOLINARI. And no such drums were identified.

Mr. CHU. Yes.

Mr. MOLINARI. So none were removed.

Mr. CHU. Yes.

Mr. MOLINARI. Do you have any records to indicate that drums were shipped to the site.

Mr. CHU. I believe so. Yes.

I think we did. When the State, Mr. Chairman, called me on April 10 and the first thing I did was come up with the plant people and try to identify the people who had personal knowledge on waste. And then we went to the site. That was the first thing. The first thing I should do is get people there as fast as we can.

Mr. MOLINARI. OK.

Mr. CHU. And we went there. James Hunt who was at the site received me and also a gentleman from EPA who was under the Clean Water Act Federal program was there, and they indicated IBM drums had been removed. And we asked if they had any knowledge on which drums they thought belonged to us. If they do, had it been set aside someplace that we can pick up. They said, No, there were no GM drums identified.

Then we walked around the site. We did not poke each drum to look at each drum because of the danger. We were masked, walking around the site, and asked the GM people, Do you recognize any of the drums? Because if we purchase a chemical material in a drum we might have certain markings, or whatever. They looked for any marking that they could recognize, but there were not any.

Now, I want to point out that this does not prove we have nothing there. The only proof that we could not. Therefore, we could not take the action that IBM did.

Mr. MOLINARI. So if I understand you correctly, you didn't check to see when any drum was shipped there. Your immediate concern was to go to the site, find out if there were any drums, and make arrangements for their removal. Subsequently, did you go back and check?

Mr. CHU. Yes.

We might have drums there. We did send drums with material there.

Mr. MOLINARI. Do you have any idea how much was shipped there?

Mr. CHU. I don't recall.

Mr. MOLINARI. Could you supply those figures to the subcommittee.

Mr. CHU. Yes. We have that information. But some are not legible. We can try our best.

[Information received from Mr. Chu follows:]

GENERATORS Box 29 GM through Great Lakes

neral Motors Corporation; Cincinnati, Ohio

Sales Package

Paint sludge for disposal; 2,000 gallons; January 18, 1973.
Waste solvents to burn; 80 drums; February 27, 1973, p.o. #N9142.
Flammable waste for disposal; 80 drums; June 13, 1974; lading #21224.
Waste solvent and oil for disposal; 68 drums fluid waste, 12 drums solid waste; May 23, 1974; lading #20630.
Miscellaneous waste for disposal; 80 drums; March 29, 1974; lading #19229.
Waste solvents for disposal; 80 drums; January 11, 1974; lading #16758.

General Motors Corporation; Norwood, Ohio

Sales Package

June 10, 1976; lot #C-0794; 80 drums flammable waste for incineraiton.
April 5, 1976; lot #C-0644; 80 drums liquid flammable waste for incineration.
January 5, 1976; lot #C-0456; 25 drums waste solvents for incineration.
November 3, 1975; lot #C-0342; 80 drums waste solvents for disposal.
September 30, 1975; lot #C-0270; 80 drums waste solvents for disposal.
July 31, 1975; lot #C-0163; 80 drums waste solvents for disposal.
May 30, 1975; lot #C-0045; 80 drums waste solvents for incineration.
March 26, 1975; p.o. #PR16909; 80 drums waste for disposal.
January 23, 1975; lading #26311; 80 drums liquid waste solvent for disposal.
October 24, 1974; lading #24039; 80 drums waste liquid for disposal.
October 10, 1974; lading #23957; 80 drums flammable waste for disposal.

Invoice Package

#20060; March 14, 1978; 80 drums flammable liquid for disposal.
#1928; 37 drums flammable liquid for disposal.
#1788; December 13, 1977; 28 drums flammable liquid for disposal.
#1752; November 29, 1977; 47 drums flammable liquid for disposal.
#1698; November 9, 1977; 48 drums flammable liquid.
#1645; October 24, 1977; 49 drums flammable liquid for disposal.
#1593; October 6, 1977; 39 drums flammable liquid for disposal.
#1518; September 17, 1977; 62 drums flammable liquid for disposal.
#1497; September 12, 1977; 62 drums flammable liquid for disposal.
#1326; July 21, 1977; 24 drums flammable liquid for disposal.
#1290; July 8, 1977; 34 drums flammable liquid.
Shipper #16434; 25 gallons liquid flammable waste; July 15, 1977.
#1237; June 21, 1977; 18 drums flammable liquid.
#1225; June 16, 1977; 40 drums flammable liquid for disposal.

General Motors Corporation; Norwood, Ohio, cont.

Invoice Package, cont.

#1224; June 16, 1977; 76 drums flammable liquid for disposal.
#1210; June 13, 1977; 80 drums flammable liquid for disposal.
#755; December 10, 1977; 80 drums flammable liquid.
#605; December 14, 1976; 79 drums flammable waste for disposal.
#395; September 30, 1976; 80 drums flammable liquid for disposal.
#315; September 15, 1976; 80 drums flammable liquid for disposal.
#165; July 29, 1976; 18 drums flammable liquid for incineration.
#137; July 23, 1976; 56 drums flammable liquid for incineration.
Order #14752; April 5, 1976; 80 drums burned liquid waste.
Order # (not discernible); January 5, 1976; 25 drums burned solvent.

Allison Division of GMC; Indianapolis, Indiana

Invoice Package

#782822; April 17, 1972; 23 drums TCP (tricresyl phosphate).
#782114; March 14, 1972; 33 drums TCP.
#515; November 9, 1976; 6,000 gallons waste for disposal.
#514; November 9, 1976; 2,000 gallons waste for disposal.
#513; November 9, 1976; 5,390 gallons waste for disposal.
#460; October 23, 1976; 4,941 gallons boiler house waste for disposal.
#458; October 23, 1976; 5,500 gallons boiler house waste for disposal.
#419; October 13, 1976; 6,000 gallons boiler house waste for disposal.
#418; October 13, 1976; 6,000 gallons boiler house waste for disposal.
#409; October 8, 1976; 6,000 gallons liquid waste for disposal.
#273; August 30, 1976; 5,020 gallons boiler house waste for incineration.
Order #7985; June 6, 1972; 825 gallons reclaimed TCP.
Order #7282; April 24, 1972; 220 gallons reclaimed TCP.
Order #7536; May 10, 1972; 480 gallons reclaimed TCP.

General Motors Corporation; Norwood, Ohio

Orders

#16007; June 10, 1976; 80 drums burned flammable waste.
#8034; June 9, 1972; 27 drums used oil to burn.
#7295; April 25, 1972; 24 drums industrial waste to burn.
#6830; March 27, 1972; 22 drums used oil to burn.
#6495; March 3, 1972; 25 drums used oil to burn.
#6136; February 8, 1972; 24 drums used oil to burn.
#5323; December 13, 1971; 25 drums used oil to burn.
#4140; October 25, 1971; 21 drums used oil to burn.
#5513; December 22, 1971; 46,260 pounds reclaimed triclene.
#5039; November 19, 1971; 44,480 pounds reclaimed triclene.

General Motors Corporation; Norwood, Ohio, cont.

Orders, cont.

#3762; October 5, 1971; 46,800 pounds reclaimed triclene foamer head.
#2635; August 9, 1971; 47,346 pounds reclaimed triclene foamer head.
#2634; August 9, 1971; 46,860 pounds reclaimed triclene foamer head.
#06507; August 7, 1970; 46,640 pounds reclaimed trichdorothylene. trichloroethene
#1054; May 20, 1971; 47,140 pounds reclaimed triclene foamer head.
#699; April 28, 1971; 46,260 pounds reclaimed triclene foamer head.
#550; April 21, 1971; 47,800 pounds reclaimed triclene foamer head.
#286; March 31, 1971; 45,360 pounds reclaimed triclene foamer head.
#09903; March 3, 1971; 47,820 pounds reclaimed triclene foamer head.
#09295; January 18, 1971; 46,560 pounds reclaimed triclene foamer head.
#09644; February 12, 1971; 45,700 pounds reclaimed triclene foamer head.
#09138; October 13, 1970; 47,620 pounds reclaimed tricyclene.

Delco-Remey Division; General Motors Corporation

Sales Package

Waste for disposal; 79 drums; May 25, 1976; #C-0767.
Waste for disposal; 78 drums; May 5, 1976; #C-0719.
Order #15229; April 12, 1976; 54 drums burned chemical.
Miscellaneous waste for incineration and identification; 80 drums; March 25, 1976; #C-0618.
Waste for disposal; 80 drums; March 4, 1976; #C-0575.
Disposal identification and chrome destruction; 78 drums; March 2, 1976; #C-0576.
Chrome acid for disposal; 1,000 gallons; February 20, 1976; #C-0545.
Waste for incineration; 80 drums; February 18, 1976; #C-0541.
Order #13379; January 5, 1976; 46 drums burned cyanide for destruction.
Waste chemicals and solvents for disposal and incineration; 78 drums; December 23, 1975; #C-0444.
Waste chemicals and solvents for disposal and incineration; 60 drums; November 14, 1975; #C-0363.
Waste solvents and waste CR03 for incineration and disposal; 79 drums; November 6, 1975; #C-0347.
Waste solvents for disposal and/or incineration; 69 drums; October 16, 1975; #C-0309.
Waste for disposal per order; 79 drums; September 18, 1975; #C-0247.
Waste chemicals and solvents for disposal and incineration; 81 drums; August 14, 1975; #C-0186.
Waste CR03 for disposal; 14 drums; July 28, 1975; #C-0156.
Waste chemicals and solvents for disposal and identification; 76 drums; July 17, 1975; #C-0132.
Waste CR03 for disposal; 1,200 gallons; July 7, 1975; #C-0111.

Invoice Package

#2095; April 20, 1978; 75 drums for disposal.
#2094; April 20, 1978; 21 drums epoxy, 21 drums epoxy.
#2078; March 31, 1978; 63 drums for disposal.
#1993; February 28, 1978; 68 various drums for disposal.
#1679; October 31, 1977; 87 various drums for disposal.
#1843; December 30, 1977; 68 drums flammable liquid, 2 drums paint filters, 3 drums waste acids for disposal.

Delco-Remey Division, General Motors Corporation, cont.

Orders, cont.

#14311; 113 drums burned chromium.
#14310; March 25, 1976; 80 drums burned miscellaneous waste, 16 drums ID of miscellaneous waste.
#13619; February 16, 1976; 84 drums burned waste.
#13618; February 20, 1976; 2,090 pounds burned chromic acid.

Delco-Remcy Division, General Motors Corporation, cont.

Invoice Package, cont.

#1764; November 30, 1977; 77 drums flammable liquid, 3 drums chromic acid, 125 pounds chrome content for disposal.
#1743; November 23, 1977; 73 drums waste chemical, 1 drum nickel nitrate, 1 drum oleum, 1 drum copper sulfate, 1 drum paint filters for disposal.
#1549; September 21, 1977; 78 drums waste chemicals, 2 drums set up material for disposal.
#1550; September 21, 1977; 64 drums waste chemicals, 9 drums set up material for disposal.
#1401; August 15, 1977; 54 drums waste, 23 drums set up waste, 2 drums chromic acid, 72 pounds chrome content, 1 drum plating solution, 1 drum cyanide identification for disposal.
#1346; July 30, 1977; 9 drums chromic acid, 1,180 pounds chrome content, 3 drums lead oxide, 69 drums chemical waste for disposal.
#477; October 30, 1976; 3 drums set up, 2 drums chromic acid, 281 pounds chrome content, 74 drums waste for disposal.
#174; July 29, 1976; 1 drum chrome, 110 pounds chrome, ~~6 drums identification~~, 11 drums set up, 60 drums waste for incineration.
#1251; June 27, 1979; 1 drum nickel sulfate, 22 pounds nickel content, 66 drums chemical waste, 12 drums set up waste, for disposal.
#1120; May 17, 1977; 11 drums set up waste for disposal.
#1069; April 30, 1977; 36 drums chemical waste, 11 drums set up waste, 6 drums identification, 5 drums chromic acid, 715 chrome content for disposal.
1973; April 8, 1977; 10 drums set up waste, 12 drums set up waste for disposal.
#946; March 31, 1977; 62 drums waste, 12 drums set up waste, 6 drums waste chrome; 810 pounds chrome content for disposal.
#904; March 18, 1977; 68 drums chemical waste, 10 drums set up waste for disposal.
#836; February 28, 1977; 64 drums waste, 2 drums chromic acid, 301 pounds chrome content, 10 drums set up waste, 3 drums nitric acid for disposal.
#667; December 31, 1976; 4 drums waste with chrome content, 550 pounds chrome content, 10 drums set up waste, 66 drums waste for disposal.
#335; September 20, 1976; 53 drums waste, 24 drums set up, 2 drums zinc chromate, 1,325 pounds chromic oxide content, 12 drums identification for disposal.
#334; September 20, 1976; 47 drums waste solvent, 6 drums set up, 10 drums identification.
#327; September 20, 1976; 77 drums mixed liquid, 1 drum set up, 28 drums identification, 2 drums chromium, for disposal.
#537; November 11, 1976; 20 drums chromic acid, 2,750 pounds chrome, 2 drums set up, 58 drums chemical waste, for disposal.

Orders

#15621; 14 drums burned waste, 79 drums burned waste.
#14313; 46 pounds burned cyanide.
#14312; March 4, 1976; 80 drums burned waste, 9 drums burned waste, 2 burned waste cadmium.

Mr. MOLINARI. One last question, Dr. Chu. Do you think EPA's assessment of General Motor's share was a fair one?

Mr. CHU. EPA—do you mean the EPA pro rata compilation? The pro rata calculation has one key point—that is, the largest contributor to the site based on government information is Chem-Dyne. There is some calculation showing they are not there, some showing they are there. Chem-Dyne was about 14 percent. So if you remove 14 percent of having that 14 percent there, then everybody else's pro rata share varies significantly.

So I don't know how to answer your question whether I think it is fair or not. No. one, the concept of the pro rata share was based on the waste shipped to the site disregards whether it is incinerate or recycle. No. two, disregard which time period was of concern because in the early days you have most likely, I cannot say 100 percent, but most likely, that those were indeed incinerated and recycled. In the later days, people sent their waste there, like the Chem-Dyne materials. And those are the ones that accumulated.

So, if you ask me whether or not I think the calculation was sound, no, it is not. But from a practical point of view, that was the only way you can allocate something.

Mr. MOLINARI. I appreciate your answers. I have no further questions.

Mr. LEVITAS. Thank you, Mr. Molinari.

Mr. Topol, were you aware of the fact that there was great controversy within EPA as to the full release for the surface cleanup portion of the settlement?

Mr. TOPOL. I wasn't aware that there was controversy within EPA. That was a subject we negotiated with the Justice Department with Mr. Ramsey. We spent a substantial amount of time negotiating and haggling over precise language. And, you know, to that extent, about all I can say as far as the government's position. It was discussed at length.

Mr. LEVITAS. The documents which we finally obtained from EPA and which have been made a part of this record and are therefore public, indicate that without exception, every single professional in EPA, even those favoring a phase two cleanup or two phase resolution to the problem, recommended against a full release for the surface cleanup.

And, you know, again, we've heard your testimony today. It's been extremely helpful. I am quite sincere when I say that you have given us a much better insight. That doesn't mean that I am pursuaded about your perception about this. As I indicated, quoting Mr. Biros, even EPA used terms like Sweetheart Deal, political risk, and things like that before the settlement was made.

And then about October 19, in that same document, Biors has that classic statement right at the end when you're just about to put it together and he says: The deal smells.

So it's not unusual while you and the rest of you who are all good-faith participants in that settlement come to one conclusion, there are some of us—both before and after this transaction—that come to a different conclusion. I suppose that reflects my perception that I had hoped to schedule this particular hearing exactly 1 month ago today on February 14 and to have presented each one of you with a Valentine as you came into the room.

Nevertheless, I respect your perception, your view, and I can speak for myself and I believe Mr. Molinari when I tell you that we have learned a great deal. And the Seymour-type settlement, based upon what you have said and on my recent conversations with EPA officials, likely will not be repeated, and should not be viewed as any precedent for future types of settlements.

But on behalf of myself and the subcommittee, I extend my appreciation and gratitude for the contributions you and your companies have made to our on-going investigation into this matter.

Thank you, very much.

We are going to take a recess for lunch. You can have lunch, I've got to go chair another committee meeting. But we will reconvene at, say, 2:15. I look forward to the testimony of the other panel which might be similar to what we have heard so far.

The subcommittee stands in recess until 2:15.

[Whereupon, at 1:20 p.m., the hearing was recessed, to reconvene at 2:15 p.m. this same day.]

AFTERNOON SESSION

Mr. LEVITAS. The subcommittee will please come to order. The chair apologizes for its late return, but I was held up at another hearing.

The next panel of witnesses today consists of: Dr. Patrick R. Atkins, who is general manager of environmental control and chief environmental engineer for Aluminum Co. of America; and also in the panel will be Robert L. Harness, director, environmental and public affairs of Monsanto Agricultural Products Co.; and finally, Mr. J. Christopher Jackson, attorney, Stewart-Warner Corp. And he is accompanied by Wilbur Sterling, director of manufacturing, Southwind Division of Stewart-Warner.

Gentlemen, I appreciate your attendance and look forward to your testimony. And if you would, raise your right hand so that I can administer the oath.

[Witnesses sworn.]

Mr. LEVITAS. Thank you very much.

Unless you have some other desired procedure, I would suggest that we hear from Dr. Atkins, Mr. Harness, and then Mr. Jackson, in that order. And then we will put questions to the panel at the end of all of your presentations.

Dr. Atkins, why don't you begin.

TESTIMONY OF PATRICK R. ATKINS, GENERAL MANAGER OF ENVIRONMENTAL CONTROL AND CHIEF ENVIRONMENTAL ENGINEER, ALUMINUM CO. OF AMERICA, ACCOMPANIED BY ROBERT L. HARNESS, DIRECTOR, ENVIRONMENTAL AND PUBLIC AFFAIRS, MONSANTO AGRICULTURAL PRODUCTS CO.; AND J. CHRISTOPHER JACKSON, ATTORNEY, AND WILBUR STERLING, DIRECTOR OF MANUFACTURING, SOUTHWIND DIVISION, STEWART-WARNER CORP.

Dr. ATKINS. Thank you, Mr. Chairman.

Mr. JACKSON. If I could, for Stewart-Warner, we have a brief technical presentation.

Mr. LEVITAS. All right, Mr. Sterling will have a presentation, also. All right, fine. Thank you.

Dr. ATKINS. Gentlemen, my name is Pat Atkins, and I'm general manager of environmental control and chief environmental engineer for Aluminum Co. of America. I am responsible for the overall environmental program for Alcoa and its subsidiaries. I am here to provide you with a brief overview of Alcoa's involvement in the Seymour Recycling Co. disposal site from Aluminum Co. of America's point of view.

If you have questions concerning our activities there, I'll be glad to respond to those at the end of this presentation or at the end of this panel presentation. If you require detailed information, I'll certainly try to supply that at a later date.

Seymour Recycling was once known as the Chemical Division of the Seymour Manufacturing Co., an Indiana corporation. The Seymour Manufacturing Co. was a family business dating back to the 1800's. Seymour Recycling Co. was set up as a division in 1969. In 1970, Seymour Recycling began distillation activity on a 13-acre site in Freeman Industrial Park in Seymour, IN, a former U.S. Air Force military training facility. In fact, the Seymour site was used until 1967 by U.S. Government contractors in order to test rocket propeliants. It is my understanding that Seymour Recycling leased the site from the city of Seymour, IN.

In July 1976, Seymour Recycling was incorporated as a separate business entity. And in March 1978, the company was sold to William L. Kovacs. After numerous difficulties in complying with the Indiana State Board of Health requirements, the site was closed in 1979 by the State and prohibited from further receipt of waste materials.

In March 1980, the United States took emergency action under authority of section 311 of the Clean Water Act. Sixty thousand drums were found on the site as well as 98 bulk storage tanks. Temporary dikes were constructed to prevent runoff and a carbon filtration unit was installed to treat surface water. In a meeting held on September 10, 1982, the USEPA indicated that the first priority at the site would be the removal of contaminated materials, including certain explosive materials and numerous leaking containers of cyanide. As a second priority, there would be soil and ground water studies on the site.

During the 1970's three Aluminum Co. of America locations, one Alcoa plant and two subsidiary plants, shipped waste materials to Seymour Recycling Co. The waste consisted of various solvents used in painting and cleaning operations. Two of the plants shipped small quantities of waste solvents for reclamation or disposal. The third plant shipped more than 600 tons of material over a period of 7 years. During the time period when materials were shipped to Seymour Recycling Co., Alcoa and its subsidiaries believed that Seymour was operating with full approval of the appropriate regulatory agencies in the State of Indiana.

All waste shipments by Alcoa to the site ceased when we became aware of the impending problems between Seymour Recycling Co. and the State of Indiana. In the summer of 1981, we became aware of a series of meetings that were being held among generators of waste materials at the Seymour site. However, because our involve-

ment at that site was very limited—the EPA records show that Alcoa and its subsidiaries contributed less than 1 percent of the volume to the Seymour site—and because we were not aware of any intensive government activity associated with that site, Alcoa did not pursue participation in those discussions.

In May 1982, Alcoa and its subsidiaries received three letters from the U.S. Department of Justice indicating that we could be liable for costs of cleanup at the Seymour site. Alcoa replied on May 20, 1982.

At a meeting that was called by the EPA in Indianapolis, IN, on September 10, 1982, Alcoa began to receive information that would ultimately result in our full awareness of the situation at the Seymour site. At that meeting, the Department of Justice indicated that discussions had been occurring for several years with some of the large generators involved at the site. They also outlined their future plans which included a requirement that, in exchange for a covenant not to sue, generators of wastes shipped to the site must pay for the cleanup of that facility. They estimated that the cleanup costs would be in the range of $30 million.

Later, Alcoa learned that 24 of the larger generators entered into an agreement with the Justice Department to fund the surface cleanup portion of the Seymour reclamation project. This group of generators agreed to conduct the surface cleanup which had been estimated by the agency to cost $15 million. However, these generators indicated that the actual cleanup would probably cost one-half the amount estimated by the agency.

The Department of Justice ultimately agreed to a settlement with that group and essentially split the remedial action program into two parts—placing a $15 million value on each part but assessing the surface cleanup group—which would be my term for that group—only $7.5 million. The surface cleanup group received a release for both surface and ground water liabilities while only committing to a cleanup program for the surface contamination.

The agency then turned to the generators who had not participated in the earlier discussions and suggested that a $15 million funding effort be undertaken to assure ground water cleanup, a potentially more complex issue and certainly an area where more unknowns exist.

In late November 1982, Aluminum Co. of America received a formal request from the agency to submit an agreement to participate in the $15 million ground water cleanup on a volume proportionate basis. We were intially given 8 days to respond to this request. That was subsequently extended to 30 days, which still is a very short timeframe in which to develop a response to a large funding request.

Alcoa reviewed the situation and determined that it would be appropriate for us to agree to a settlement similar to that developed by the generators who had entered into an earlier agreement. We responded to the agency that we would purchase an assurance bond for our proportionate share of a $15 million ground water cleanup. However, we would agree to provide a cash settlement for one-half of our portion of the $15 million cleanup amount so that that could be used for the initiation of the ground water studies and mitigation program. We agreed—we offered to agree—that if

the studies indicated that additional funds were needed, the surety bond could be used to provide additional funds up to our portion of the total $15 million estimated amount. We believed that this agreement would provide the agency with the resources to conduct the detailed studies and mitigation program and undertake the necessary remedial action.

This agreement would have required that Alcoa pay $135,000 toward the subsurface cleanup program and purchase a surety bond for an additional $135,000. The surety bond would have been activated only if the total site cleanup for the Seymour facility exceeded $15 million for the combined surface and subsurface cleanup. Alcoa's surety bond would have been used to fund Alcoa's portion of the cleanup costs in excess of $15 million, up to a total of $30 million when our entire surety bond would be exercised.

The Department of Justice held fast to their belief that Alcoa and its subsidiaries should pay a cash buy-out cost in proportion to their total waste shipped to the Seymour site which amounted to, by their calculations, $256,680 of the estimated $30 million cleanup program. Ultimately, Alcoa agreed to the settlement offer. It is ironic that under this agreement, even though wastes from Alcoa and its subsidiaries represent only 0.8557 percent of the volume of material shipped to the Seymour site, there are only six parties that have paid more for the cleanup than the amount agreed to by Aluminum Co. of America. On EPA's list, Alcoa and its subsidiaries rank 24th in volume; however, we are required to pay significantly more than companies ranked as low as 10th on the list which shipped at least twice as much waste material as Alcoa.

There are a number of problems associated with the Seymour site and the negotiations surrounding the funding of the cleanup program.

The communications were very poor between the agencies and the generators. Alcoa had no knowledge of the problems at the Seymour site and the agency's concerns about these problems until the cease-and-desist order was given to the Seymour Recycling Co.

We had limited knowledge concerning the EPA and the Department of Justice involvement in the site until the summer of 1982 when we received a notice requesting information about materials shipped to the Seymour site.

We were not a part of the discussions among a selected group of generators who conducted a site assessment study on their own and arbitrarily split the cleanup program between the surface and the subsurface.

We were not aware that the Department of Justice was considering acceptance of that agreement without notification to the other generators that such an agreement was pending.

We were not provided the time to appropriately structure a settlement agreement and communicate that agreement to the agencies involved. We were, in effect, placed on a short timeframe which required that we accept the Government's offer or enter into litigation—essentially a take-it-or-leave-it offer.

Aluminum Co. of America now handles the waste materials that were previously shipped to the Seymour site by shipping those materials to EPA approved disposal sites under appropriate manifests. We carefully monitor the wastes from the time they leave our facil-

ity until the disposal notification is received. Alcoa personnel visits each site where the wastes are disposed or recycled, and we investigate financial resources and environmental liabilities associated with these sites. We're taking every reasonable precaution to ensure that our waste materials are handled and disposed of properly. To as great an extent as possible, we rely on our own resources to make these evaluations. However, we do feel that it is incumbent upon regulatory agencies authorized to provide permits and oversight of these wast disposal facilities to ensure the long-term viability of these disposal sites and to prevent a reoccurrence of the Seymour Recycling Co. incident.

That concludes my testimony.

Mr. LEVITAS. Thank you, Dr. Atkins. We appreciate your testimony. We have a number of questions, but we'll save them.

[The statement of Dr. Atkins follows:]

TESTIMONY BEFORE THE SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT OF THE COMMITTEE OF PUBLIC WORKS AND TRANSPORTATION

Good morning, ladies and gentleman. My name is Patrick R. Atkins, General Manager of Environmental Control and Chief Environmental Engineer for Aluminum Company of America. I am responsible for the overall environmental program for Aluminum Company of America and its subsidiaries. I am here this morning to provide you with a brief overview of Alcoa's involvement in the Seymour Recycling Company disposal site from Aluminum Company of America's point of view. If you have questions concerning our activity there, I will be glad to respond to those at the end of this presentation. If you require detailed information, we will certainly try to supply that at a later date.

Seymour Recycling was once known as The Chemical Division of the Seymour Manufacturing Company, an Indiana Corporation. The Seymour Manufacturing Company was a family business dating back to the 1800s. Seymour Recycling Company was set up as a division in 1969. In 1970, Seymour Recycling began distillation activity on a 13-acre site at Freeman Industrial Park in Seymour, Indiana, a former U.S. Air Force military training facility. In fact, the Seymour site was used until 1967 by the U.S. government contractors in order to test rocket propellant. It is my understanding that Seymour leased the site from the City of Seymour, Indiana.

In July, 1976, Seymour Recycling was incorporated as a separate business entity. In March, 1978, the company was sold to William L. Kovacs. After numerous difficulties in complying with the Indiana State Board of Health requirements, the site was closed in 1979 by the state and prohibited from further receipt of waste materials.

In March, 1980, the United States took emergency action under authority of Section 311 of the Clean Water Act. Sixty thousand drums were found on the stie as well as 98 bulk storage tanks. Temporary dikes were constructed to prevent runoff and a carbon filtration unit was installed to treat surface water. In a meeting held on September 10, 1982, the U.S. EPA indicated that the first priority at the site would be the removal of contaminated materials, including certain explosive materials and numerous leaking containers of cyanide. As a second priority, there would be soil and groundwater studies on the site.

During the 1970s, three Aluminum Company of America locations, one Alcoa plant and two subsidiary plants, shipped waste materials to Seymour Recycling Company. The waste consisted of various solvents used in painting and cleaning operations. Two of the plants involved shipped small quantities of waste solvents for reclamation or disposal. The third plant shipped more than 600 tons of material over a period of seven years. During the time period when materials were shipped to the Seymour Recycling Company, Alcoa and its subsidiaries believed that Seymour was operating with full approval of the appropriate regulatory agencies in the State of Indiana.

All waste shipments by Alcoa to the site ceased when we became aware of the impending problems between Seymour Recycling Company and the State of Indiana. In the summer of 1981, we became aware of a series of meetings that were being held among generators of waste materials at the Seymour site. However, because of our involvement at that site was very limited (EPA records show that Alcoa and its subsidiaries contributed less than 1 percent of the material to the Seymour site) and

because we were not aware of any intensive government activity associated with that site, Alcoa did not pursue participation in those discussions.

In May, 1982, Alcoa and its subsidiaries received three letters from the U.S. Department of Justice indicating that we could be liable for costs of cleanup at the Seymour site. Alcoa replied on May 20, 1983.

At a meeting that was called by EPA in Indianapolis, Indiana, on September 10, 1982, Alcoa began to receive information that would ultimately result in our full awareness of the situation at the Seymour site. At that meeting, the Department of Justice indicated that discussions had been occurring for several years with some of the large generators involved at the site. They also outlined their future plans which included a requirement that in exchange for a covenant not to sure, generators of wastes shipped to the site must pay for the cleanup of the facility. They estimated that the clean-up costs would be in the range of 30 million dollars.

Later, Alcoa learned that 24 of the larger generators entered into an agreement with the Justice Department to fund the surface clean-up portion of the Seymour reclamation project. This group of generators agreed to conduct the surface cleanup which had been estimated by the Agency to cost 15 million dollars. However, these generators indicated that the actual cleanup would probably cost one-half the amount estimated by the Agency. The Department of Justice ultimately agreed to a settlement with that group and essentially split the remedial action program into two parts—placing a 15 million dollar value on each part but assessing the "surface clean-up group" only 7.5 million dollars. The "surface clean-up group" received a release for both surface and groundwater liabilities while only committing to a clean-up program for the surface contamination. The Agency then turned to the generators who had not participated in the earlier discussions and suggested that a 15 million dollar funding effort be undertaken to assure groundwater cleanup, a potentially more complex issue, and certainly an area where more unknowns exist.

In late November, 1982, Aluminum Company of America received a formal request from the Agency to submit an agreement to participate in the 15 million dollar ground water cleanup on a volume proportionate basis. We were initially given eight days to respond to this request. That was subsequently extended to 30 days, still a very short time frame to develop a response to a large funding request.

Alcoa reviewed the situation and determined that it would be appropriate for us to agree to a settlement similar to that developed by the generators who had entered into an earlier agreement. We responded to the Agency that we would purchase an assurance bond for our proportionate share of a 15 million dollar ground water cleanup. However, we would agree to provide a cash settlement for one half of our portion of the 15 million dollar cleanup amount to be used for the initiation of the ground water study and mitigation program. We agreed that if the studies indicated that additional funds were needed, the surety bond could be used to provide additional funds up to our portion of the total 15 million dollar estimated amount. We believed that this agreement would provide the Agency with the resources to conduct the detailed studies and mitigation programs and undertake the necessary remedial action.

This agreement would have required that Alcoa pay $135,000 towards the sub-surface clean-up program and purchase a surety bond for up to an additional $135,000. The surety bond would have been activated only if the total site cleanup for the Seymour facility exceeded 15 million dollars for the combined surface and sub-surface cleanup. Alcoa's surety bond would have been used to fund Alcoa's proportion of the cleanup costs in excess of 15 million dollars, up to a total of 30 million dollars when our entire surety bond would be exercised.

The Department of Justice held fast to their belief that Alcoa and its subsidiaries should pay a cash buy-out cost in proportion to their total waste shipped to the Seymour site which amounted to $256,680.00 of the estimated 30 million dollar clean-up program. Ultimately, Alcoa agreed to this settlement offer. It is ironic that under this agreement even though wastes from Alcoa and its subsidiaries represent only 0.8557 percent of the volume of material shipped to the Seymour site, only six parties have paid more for the cleanup than the amount agreed to by Aluminum Company of America. On EPA's list, Alcoa and its subsidiaries rank 24th in volume. However, we are required to pay significantly more than companies ranked as low as 10th on the list that shipped as least twice as much material as Alcoa.

There are a number of problem areas associated with the Seymour site and the negotiations surrounding the funding of the clean-up program.

Communications were very poor between the agencies and the generators. Alcoa had no knowledge of the problems at the Seymour site and the Agency's concerns about those problems until the cease and desist order was given to the Seymour Recycling Company.

We had limited knowledge concerning the EPA and Department of Justice involvement in the site until the summer of 1982 when we received a notice requesting information about materials shipped to the Seymour site.

We were not a part of the discussions among a selected group of generators who conducted a site assessment study on their own and arbitrarily split the clean-up program between the surface and sub-surface.

We were not aware that the Department of Justice was considering acceptance of that agreement without notification to the other generators that such an agreement was pending.

We were not provided the time to appropriately structure a settlement agreement and communicate that agreement with the agencies involved. We were in effect placed on a short time frame which required that we accept the government's offer or enter into litigation—essentially a take it or leave it offer.

Aluminum Company of America now handles the waste materials that were previously shipped to the Seymour site by shipping those materials to EPA approved disposal sites under appropriate manifests. We carefully monitor the wastes from the time they leave our facility until the disposal notification is received. Alcoa personnel visit each site where waste materials are disposed or recycled and we investigate the financial resources and environmental liabilities associated with those sites. We are taking every reasonable precaution to ensure that our waste materials are handled and disposed of properly. To as great an extent as possible, we rely on our own resources to make these evaluations. However, we do feel that it is incumbent upon regulatory agencies authorized to provide permits and oversight of the waste disposal facilities to ensure the long-term viability of these disposal sites and to prevent a reoccurrence of the Seymour Recycling Company incident.

Mr. LEVITAS. The next statement will be made by Robert L. Harness of the Monsanto Co.

Mr. Harness.

Mr. HARNESS. Thank you, Mr. Chairman, Mr. Molinari. My name is Bob Harness, and, as you said, I am director of environmental and public affairs for Monsanto Agricultural Products Co. In accordance with your letter of March 5, I am here to testify on Monsanto's involvement in the Seymour Recycling Co. as well as to discuss briefly our hazardous waste control program and cleanup.

Before talking about our involvement in the Seymour site, I would like to briefly describe Monsanto's environmental program, emphasizing hazardous waste management. I hope this will put our actions at Seymour into a proper context, and I will do this paraphrasing what I submitted as a statement.

Mr. LEVITAS. Let me announce that the entire statements, as written and submitted by each of the witnesses, will be made part of the record. And without objection it is so ordered, so feel free to proceed as you wish.

Mr. HARNESS. Thank you.

Over the past few years, Monsanto has developed on a continuing basis the organization and policies and programs to deal with hazardous waste responsibly. And today we have the equivalent of about 1,300 employees involved in environmental and health protection programs, the responsibility being at the very top of the organization with a senior vice president for environmental policy.

We've had programs in place to deal with hazardous waste management long before RCRA was passed, including visits and inspections of sites and disposal of hazardous wastes through recycle operations. After passage of RCRA, we restated those policies and tried to strengthen it in recent years. More recently, we have involved ourselves in a program to promptly clean up all hazardous waste sites, both on and off our property, where Monsanto waste

may represent a problem. And this problem has the attention of the highest levels of management in Monsanto.

We've changed these programs over time and will continue to do so as we gain knowledge about better ways to deal with hazardous waste. But for the past few years, our priority has been to reduce waste wherever possible. The small percentage—and I might add that is about less than 10 percent of our wastes that are disposed of off site--are shipped to EPA approved landfills or incineration facilities. We contract with the disposer and use their RCRA manifest program.

Additionally, we have corporate research programs to eliminate the volume of waste we produce. Like some of the other companies that have testified, that is our highest priority, to eliminate the waste at the source of production. Where possible, we are modifying or improving processes to eliminate or to reduce wastes. In addition, we look at more attractive, effective ways of waste treatment and disposal.

Let me turn for a few minutes to the Seymour site. Involvement at Seymour has been a very complicated and frustrating affair for Monsanto. And, unfortunately, in spite of some repeated attempts to participate fairly in the cleanup effort, I regret to say to this subcommittee and to the people of Seymour that we are still a nonsettling party. I hope what I have to say will indicate that we have tried in good faith to achieve equitable settlement. We want to meet our environmental responsibilities there. Let me assure at the outset of this part of the statement that we're going to continue working toward a settlement with the Government, toward a fair and effective solution to whatever problems may remain at the site.

On discussing Seymour, Mr. Chairman, I think there are three periods of time to keep in mind: The first is prior to the middle half of 1982; the second, the second half of 1982; and the third is from December 1982, until the present. Circumstances were different during each of these periods and I'll discuss each separately. Recognizing that the subcommittee is quite familiar with the history of the site, I'll focus just on Monsanto's involvement.

The first period, through the middle of 1982, consists of the initial Government involvement at this site and the earliest discussions with Monsanto regarding settlement. For several years Monsanto did business with Seymour Recycling Co. for the processing and disposal of chemical wastes in recycling operations for Monsanto locations. These activities took place in the mid- to late-1970's.

In early 1982, Monsanto took part in discussions with other companies not yet involved in the litigation, concerning possible cleanup of the site. For a variety of reasons, principally a lack of factual information from the Government as to the basis for its claims against the parties, Monsanto decided to withdraw from this group.

Mr. Topol discussed this earlier today in response to your questions, Mr. Chairman.

On May 20, 1982, the Government notified Monsanto that it was considered a potentially responsible party.

Now, the second period of time, the latter half of 1982, covers formal discussions with the Government to settle the case. In August 1982, Monsanto received notification from the Department

of Justice of a September 1982 meeting of the involved parties, which we did attend. At this meeting we learned that the total cost of the surface and subsurface cleanup was estimated by the Government to be $30 million. I would like to stress at this point that no definitive study on the extent of contamination and the necessary cleanup program have been performed.

The Government assured all parties at that time that we would be treated equally. However, we later learned that other negotiations were in progress between the Government and a small number of companies eventually becoming the group of 24. Our efforts to be included in this group were rejected and we read the agreement, that had been reached by the 24 firms, in the October 19, 1982, Federal Register.

The Government later informed Monsanto in a letter that its pro rata share of the Seymour cleanup cost was determined to be $1.32 million. This was the Government's final walk-away settlement offer.

Monsanto then attempted to meet with the Government to offer a cash settlement on a basis equivalent to the group of 24. In addition, we offered to lead the remaining nonsettlers in a subsurface cleanup program. This proved unsuccessful. At the same time, we felt we could not accept the Government's settlement proposal of $1.32 million because there was no basis for this cleanup cost estimate. We also considered it unfair when compared with the basis on which the group of 24 settled.

In addition, we believed that subsurface cleanup would cost substantially less than the Government's estimate. We did not wish to delay the cleanup effort, but we did feel that a necessary first step should be a definitive study of the extent of environmental contamination and the design of a specific cleanup plan.

We further believed that the division of the problem into two equal halves, surface and subsurface, was completely arbitrary. Consequently, when the Government's offer to settle expired on November 29, 1982, Monsanto found itself to be a nonsettler.

Now for the final time period. Since November 1982, Monsanto has spent considerable time and resources investigating effective approaches for subsurface cleanup. Two engineers from the engineering department, four managers from our environmental management group, and two attorneys have been involved in this effort. We have retained one consultant and sought a proposal from another.

Monsanto has made a number of specific proposals to the Government, in person and in writing, to develop and implement a subsurface cleanup program. We offered to pay the cost of the assessment study, to pay our fair share of the final cleanup costs, and to organize the remaining parties to fund the final cleanup. All these offers were rejected. The Government's principal reason for refusal was the fact that we did not provide for a guaranteed cleanup.

We maintained contact with the major nonsettlers, and by October 1983, most appeared favorable to a settlement and to our proposed remedial action plan. I might add that the people here, from Stewart-Warner, were very active in this effort as well. We met with the PRP's and then visited Seymour to review our plan with

the city officials. We sought their help in the potential use of the cityowned treatment facility in the cleanup plan. The city also responded favorably, then we presented our proposal to the EPA and Department of Justice on November 7, 1983; unfortunately, DOJ rejected it.

The subsequent lawsuit disorganized the coalition of potential responsible parties. We since have spent additional time to bring this group back together, which now consists of 49 alleged generator defendants who are involved in the lawsuit.

Useful discussion between the defendants and the Department of Justice has resumed. The Government has indicated, however, that settlement anytime soon is impossible.

A year-long study, commencing this month, has already been contracted. The government will not entertain a remedial action plan until the study is complete. I might add that had we proceeded with our plan earlier, that study would be complete by now.

The defendants have proposed to stay in the lawsuit in order to work with the DOJ on that study and to develop and carry out a cost-effective remedial action plan. On February 29 a number of defendants met in St. Louis to organize and prepare for a meeting with EPA and DOJ. These defendants want to work with the Government to clean up Seymour rather than to litigate the case. However, on Monday of this week, March 12, 1984, the DOJ told us it would oppose any stay.

It is unfortunate that it now appears that the defendants will have to devote resources to an individual defense rather than a joint study effort. Monsanto has discussed progress with the mayor on a recent visit to Seymour. He supports our efforts and is interested in a quick cleanup. However, we are all frustrated at this point.

As one of the first Superfund sites, Seymour has presented difficulties both to Government and to industry. It appears that some of the earlier developments may now be delaying final actions to bring the Seymour story to a successful end.

But certainly, Seymour offers some lessons on how waste site cleanup programs involving multiple parties should be handled. I would like to offer three to you.

First, the extent of the contamination and the specific cleanup program should be clearly defined before settlement agreements are sought. I am glad to say this is the policy now being followed by EPA, and is a welcome change from the way Seymour was handled. PRP's should not be sued until offered a settlement based on such a clearly defined cleanup plan.

I might add, Congressman, this is not something that takes years and years to develop.

Secondly, all parties should be given the opportunity to settle on the same basis, and independently if they so desire.

And third, all PRP's should have an opportunity to participate in defining the problem and the solution.

I believe such an approach would lead to more voluntary settlement agreements.

I think both sides have made mistakes in this case. However, good progress is being made toward a final cleanup, and I think we will be successful in the end.

I thank you for the opportunity to give this statement, and I would be pleased to answer questions when you are ready.

Mr. LEVITAS. Thank you very much.

[The statement of Mr. Harness follows:]

STATEMENT OF ROBERT L. HARNESS

Mr. Chairman. My name is Bob Harness. I am Director, Environmental and Public Affairs, for Monsanto Agricultural Products Company. In accordance with your letter of March 5, 1984, I am here today to testify on Monsanto's involvement in the Seymour Recycling Company site as well as on our hazardous waste control and cleanup programs.

Before providing details on Monsanto's involvement at Seymour, I would like to briefly describe Monsanto's environmental program, emphasizing hazardous waste management. This may help to put our actions at Seymour in proper context.

Over the past several years, Monsanto has been developing the organization, policies and programs to deal with hazardous waste responsibly. Today, the company has the equivalent of over 1,300 employees involved in environmental and health protection programs. The responsibility for these programs rests at the highest management levels in the company, with a Senior Vice President.

Monsanto's program to control hazardous waste has been in place since well before the passage of RCRA in 1976. Our program includes visits and inspections to contract waste disposal facilities and contract recycle operations. Waste management policies were restated in 1977 and have been progressively strengthened. Most recently, we have established a program to promptly clean up old hazardous waste sites, both off and on our property, where Monsanto wastes may present a problem. This program has the attention of the highest levels of management in Monsanto.

Our programs and policies have evolved over time and will continue to do so as we gain experience and knowledge. We are continually working to refine the goals and results of our programs and the methods for achieving them.

For the past several years, Monsanto's policy has been to dispose of or destroy hazardous waste at company production sites. More than 90 per cent of our wastes are handled in this way. The small percentage of wastes disposed of off site is done at EPA-approved landfills or incineration facilities. We contract with the disposer and use the manifest procedure established under RCRA.

In addition, we have active programs to reduce the volume of waste we produce. Our goal is to eliminate or minimize the use of landfills. Where possible, we are modifying or improving processes to eliminate or reduce wastes. In addition, we are researching alternative, more effective methods of waste treatment and disposal.

Involvement at the Seymour site has been a complicated and frustrating affair for Monsanto. Unfortunately, Monsanto, despite repeated attempts to participate fairly in the cleanup effort, still remains a non-settling party. I hope what I have to say will indicate to this subcommittee and to the people of Seymour that Monsanto has been trying in good faith to achieve an equitable settlement. We want to meet our environmental responsibilities there. Let me assure you at the outset that we are going to continue working with the government toward a fair and effective solution to whatever problems may remain at the site.

With respect to Seymour, there are three important time periods to keep in mind. The first is before mid-1982; the second is the latter half of 1982; and the third is from December 1982 to the present. Circumstances were different during each period, and I'll discuss each separately. Recognizing that you are well acquainted with the history of this site, I'll focus on Monsanto's involvement.

The first period, through the middle of 1982, consists of the initial government involvement at the site and the earliest discussions regarding settlement.

For several years, Monsanto did business with Seymour Recycling Company for the processing and disposal of chemical wastes from various Monsanto operations. These activities took place during the mid- to late-1970's.

In early 1982, Monsanto took part in discussions with other companies not yet involved in the litigation, concerning possible cleanup of the site. For a variety of reasons, principally a lack of factual information from the government as to the basis for its claims against the parties, Monsanto decided to withdraw from this group. Then on May 20, 1982, the government notified Monsanto that it was considered a potentially responsible party.

The second period of time, the latter half of 1982, covers formal discussions with the government to settle the case.

In August, 1982, Monsanto received notification from the Department of Justice of a September, 1982 meeting of involved parties, which we attended. At this meeting we learned that the total cost of surface

42-590 O—85——74

and subsurface cleanup was estimated to be $30 million. I want to stress that no definitive study on the extent of contamination and the necessary cleanup program had been performed. The government assured all parties that we would be treated equally. However, we later learned that other negotiations were in progress between the government and a small number of companies. Our efforts to be included in this group were rejected. We read the agreement reached by 24 firms that settled in the Federal Register on October 19, 1982.

The government later informed Monsanto, in a letter, that its pro-rata "share" of the Seymour cleanup cost was determined to be $1.32 million. This was the government's final, "walk-away" settlement offer.

Monsanto then attempted to meet with the government to offer a cash settlement on a basis equivalent to the "group of 24." In addition, we offered to lead the remaining non-settlers in a subsurface cleanup program. This proved unsuccessful. At the same time, we felt we could not accept the government's settlement proposal of $1.32M because there was no basis for this cleanup cost estimate. We also considered it unfair when compared with the basis on which the group of 24 settled. In addition, we believed that subsurface cleanup would cost substantially less than the government's estimate.

We did not wish to delay the cleanup effort. But we did feel that a necessary first step should be a definitive study of the extent of environmental contamination and the design of a specific cleanup plan.

We further believed that the division of the problem into two "equal" halves - surface and subsurface - was completely arbitrary. Consequently, when the government's offer to settle expired on November 29, 1982, Monsanto found itself to be a non-settler.

Now for the final time period. Since November, 1982, Monsanto has spent considerable time and resources investigating effective approaches for subsurface cleanup. Two engineers from our engineering department, four managers from our environmental management group and two attorneys have been involved in this effort. We have retained one consultant and sought a proposal from another. Monsanto made a number of specific proposals to the government, in person and in writing, to develop and implement a subsurface cleanup program. We offered to pay the cost of the assessment study, to pay our fair share of the final cleanup costs, and to organize the remaining parties to fund the final cleanup. All these offers were rejected. The government's principal reason for refusal was that we did not provide for a guaranteed cleanup.

We maintained contact with the major non-settlers and by October 1983 most appeared favorable to settlement and to our proposed remedial action plan. We met with the PRP's, then visited Seymour to review our plan with City officials. We sought their help in the potential use of the City-owned treatment facility in the cleanup plan. The City also responded favorably. Then we presented our proposal to the EPA and DOJ on November 7, 1983; unfortunately, DOJ rejected it. The subsequent lawsuit

disorganized the coalition of PRP's. We since have spent additional time to bring together the 49 generator defendants in the lawsuit to seek resolution of the matter.

Useful discussion between the defendants and the Department of Justice has resumed. The government has indicated, however, that settlement any time soon is impossible. A year-long study, commencing this month, had already been contracted. The government will not entertain a remedial action plan until the study is complete.

The defendants have proposed a stay in the lawsuit in order to work with the DOJ on that study and to develop and carry out a cost-effective remedial action plan. On February 29, a number of the defendants met with Monsanto in St. Louis to organize and prepare for a meeting with EPA and DOJ. These defendants want to work with the government to clean up Seymour rather than litigate the case. However, on Monday of this week (March 12, 1984), the DOJ told us that it would oppose any stay. It is unfortunate that the defendants will now have to devote resources to individual defense rather than a joint study effort. Monsanto has discussed progress with the Mayor on a recent visit to Seymour. He supports our efforts and is interested in a quick cleanup. However, we all are frustrated at this point.

As one of the first Superfund sites, Seymour has presented difficulties to both the government and to industry. It appears that some of the earlier developments may now be delaying final actions to bring the Seymour story to a successful end.

Seymour certainly offers some lessons on how waste site cleanup programs involving multiple parties should be handled.

First, the extent of the contamination and the specific cleanup program should be clearly defined before settlement agreements are sought. I'm glad to say this is the policy now being followed by EPA, and is a welcome change from the way Seymour was handled. PRP's should not be sued until offered a settlement based on such a clearly defined cleanup plan.

Second, all parties should be given the opportunity to settle on the same basis, and independently if they desire.

Third, all PRP's should have the opportunity to participate in defining the problem and the solution.

I believe such an approach would lead to more voluntary settlement agreements.

As I stated earlier, I believe both sides have made mistakes in this case. However, good progress is being made toward a final cleanup, and I believe we will be successful.

Thank you for the opportunity to appear before your subcommittee.

Mr. LEVITAS. Now, Mr. Jackson, we are going to hear from you.
Mr. JACKSON. If we may, Congressman——
Mr. LEVITAS. Do you want to hear from Mr. Sterling first?
Mr. JACKSON. Yes, if that is OK.
Mr. LEVITAS. Mr. Sterling.
Mr. STERLING. Mr. Chairman and members of the committee, my name is Wilbur Sterling. I am director of manufacturing for the South Wind Division of Stewart-Warner Corp., located in Indianapolis.

The purpose of my testimony today is to review briefly the South Wind Division's practices and procedures for disposing of hazardous wastes in the past—as concerns the Seymour site—presently and in the future.

Our records indicate that the Seymour Manufacturing Co., which was one of the few recycling and disposal sites known to us at that time, had been in business since 1872. They were granted a permit on October 23, 1974, by the Technical Secretary of the Indiana Air Pollution Control Board to operate their oily sludge incinerators at Freeman Field, Seymour, IN.

All operations were to be conducted in full compliance with the provisions of the Indiana Air Pollution Control law and regulations promulgated thereunder. In addition, the Seymour Manufacturing Co. was authorized to move and transport liquid material wastes by the Indiana Stream Pollution Control Board. We were confident at the time we first selected Seymour for a recycling site, based on the available information, that it could be relied upon to recycle or dispose of our material in a safe and efficient manner and in full compliance with the State of Indiana regulations.

With the passage of the Resource Conservation and Recovery Act, there was an increased awareness of ensuring that all wastes were properly disposed of. In addition to ensuring each site to which wastes were to be sent was properly permitted by State and Federal authorities, audits were conducted by experienced South Wind personnel. The audit program being followed includes such items as obtaining EPA identification number, determining a facility's years of operation and whether or not he had a spill contingency plan, and if so, whether there is police and fire coordination to implement such a plan.

In addition, questions regarding ground water well testing and frequency of tests are asked. Financial ability and insurance levels are reviewed. An investigation is made into what a site does with still bottoms; in other words, are they incinerated or landfilled? Several other items are checked and reviewed before an audit is complete.

In addition to the above, we have and are continuing to reduce the volume of hazardous waste that is generated. As an example, at the time of the first deliveries to the Seymour Manufacturing Co., no vapor degreaser in Stewart-Warner's Indianapolis plant was equipped with a still for removing oil. Consequently, the service life of the degreasing fluid was very short, which required that a high volume of degreasing fluid be disposed of. As of March 12, 1984, this plant has six vapor degreasers of which three are equipped with stills, while a still for the fourth unit is on order.

In addition, appropriation for a still for the fifth and sixth units is in the process of being approved with installation scheduled for the near future.

We have also installed filters and changed flushing methods to reduce the rate at which Stoddard Solvent becomes contaminated and unsatisfactory for use in the flushing of oil coolers. We also are investigating the purchase of a steam injection still for in-house recycling of Stoddard Solvent.

Shipments to disposal companies are periodically reviewed to determine what action is practical to further reduce the volume of waste shipped from a plantsite. The latest review, conducted in March 1984, shows that the highest priority areas for reduction are: Stoddard Solvent, perchlorethylene and diesel fuel grade No. 2.

In regard to Stoddard Solvent, action taken by Manufacturing Engineering to reduce the contamination should bring about a major reduction. A review was made in June 1984 to determine the effects of these process changes. The volume of perchlorethylene waste will be further reduced when the new still-equipped vapor degreasers are installed. The plant engineering department has been instructed to prepare a proposal to filter diesel fuel grade No. 2 for use in our diesel-powered equipment.

It is expected that the above changes and continued monitoring of the hazardous waste area will reduce significantly the chances of the South Wind Division ever again being involved in a site such as Seymour.

Thank you for the opportunity to appear and testify on this issue.

Mr. LEVITAS. Thank you.

[The statement of Mr. Sterling follows:]

TESTIMONY OF WILBUR STERLING

Mr. Chairman and Members of the Committee on Public Works and Transportation, my name is Wilbur Sterling, Director of Manufacturing for the South Wind Division of Stewart-Warner Corporation located in Indianapolis, Indiana. The purpose of my testimony today is to review briefly South Wind Division's practices and procedures for disposing of hazardous wastes in the past—as concerns the Seymour site—presently and in the future.

Our records indicate that the Seymour Manufacturing Company, which was one of the few recycling and disposal sites known to us at the time, had been in business since 1872. They were granted a permit on October 23, 1974, by the Technical Secretary of the Indiana Air Pollution Control Board to operate their oily sludge incinerators at Freeman Field, Seymour, Indiana. All operations were to be conducted in full compliance with the provisions of the Indiana Air Pollution Control Law and regulations promulgated thereunder. In addition, the Seymour Manufacturing Company was authorized to remove and transport liquid industrial wastes by the Indiana Stream Pollution Control Board. We were confident at the time we first selected the Seymour site for recycling and disposal of waste that, based on all available information, it could be relied upon to recycle or dispose of our material in a safe and efficient manner and in full compliance with State of Indiana regulations.

With the passage of the Resource Conservation and Recovery Act, there was an increased awareness of ensuring that all wastes were properly disposed of. In addition to ensuring each site to which wastes were to be sent was properly permitted by State and Federal authorities, audits were conducted by experienced South Wind personnel. The audit program being followed includes such items as obtaining EPA identification number, determining a facility's years of operation and whether or not it has a spill contingency plan and, if so, whether there is police and fire coordination to implement such a plan. In addition, questions regarding ground water well testing and frequency of testing are asked. Financial ability and insurance levels are reviewed. Investigation is made into what a site does with still bottoms; in

other words, are they incinerated or landfilled? Several other items are checked and reviewed before an audit is complete.

In addition to the above, we have and are continuing to reduce the volume of hazardous waste that is generated. As an example, at the time of our first deliveries to the Seymour Manufacturing Company, no vapor degreaser in Stewart-Warner's Indianapolis plant was equipped with a still for removing oil. Consequently, the service life of the degreasing fluid was very short, which required that a high volume of degreasing fluid be disposed of. As of March 12, 1984, this plant has six vapor degreasers of which three are equipped with stills, while a still for the fourth unit is on order. In addition, appropriation for a still for the fifth and sixth units is in the process of being approved with installation scheduled for the near future. We have also installed filters and changed flushing methods to reduce the rate at which Stoddard Solvent becomes contaminated and unsatisfactory for use in the flushing of oil coolers. We also are investigating the purchase of a steam injection still for in-house recycling of Stoddard Solvent.

Shipments to disposal companies are periodically reviewed to determine what action is practical to further reduce the volume of waste shipped from the plant site. The latest review conducted in March, 1984, shows that the highest priority areas for reduction are: Stoddard Solvent, Perchlorethylene and Diesel Fuel Grade #2. In regard to the Stoddard Solvent, action taken by Manufacturing Engineering to reduce the contamination should bring about a major reduction. A review will be made in June, 1984, to determine the effects of these process changes. The volume of Perchlorethylene waste will be further reduced when the new still-equipped vapor degreasers are installed. The Plant Engineering Department has been instructed to prepare a proposal to filter Diesel Fuel Grade #2 for use in our diesel powered equipment.

It is expected that the above changes and continued monitoring of the hazardous waste area will reduce significantly the chances of the South Wind Division even again being involved in a site such as Seymour.

Thank you for the opportunity to appear and testify on these issues today.

Mr. LEVITAS. Mr. Jackson.

Mr. JACKSON. Thank you, Mr. Chairman.

Again, my name is Chris Jackson, and I am an attorney employed by the Stewart-Warner Corp. Stewart-Warner Corp., whose corporate headquarters is located in Chicago, IL, consists of 11 operating divisions and subsidiaries. One of the divisions is the South Wind Division, located in Indianapolis, IN. South Wind is a manufacturer of heat transfer equipment and combustion heating devices, and it is waste from that division which found its way to the Seymour site. With that brief background, I would like to address some of the matters being reviewed by your committee.

Stewart-Warner did not participate in the October 1982 Seymour Recycling Corp. settlement negotiations. The settlement entered into between the Government and the IBM/TOPOL group of 24 companies on or about October 26, 1982, was a surprise to Stewart-Warner.

It was the position of Stewart-Warner at the time, and still is, that the agreement and subsequent consent decree entered into between the so-called "gang of 24" and the Government, was patently unfair, inequitable, and should not have been allowed by the court under any circumstances.

In September 1982, Stewart-Warner was one of several companies which attended meetings with the Government in Indianapolis, IN. Specifically, Stewart-Warner was present in Indianapolis on September 10, 1982, when the Government gave a brief overview of the Seymour site and announced that no one had undertaken voluntary cleanup action and that all parties would shortly be served with a demand to pay a pro rata share of the cleanup.

EPA had established the costs of the cleanup to be $30 million; $15 million for the surface and $15 million for the subsurface.

In Stewart-Warner's view, the consent decree entered into by the Government and the group of 24 companies was unfair for several reasons, reasons which include:

First, the Government singled out 24 companies for settlement on favorable terms after long and arduous negotiations. The remaining generators were given a "take it or leave it" offer with little time to do anything but accept or reject.

Second, the settling group of 24 generators paid less than their proportional fair share, based upon the Government's estimate of total cleanup costs. A company's "fair share" was arrived at by the Government in the following manner: It took the total tonnage of waste its records showed were shipped to the site by a given company and divided it by the total tonnage of waste at the site. It multiplied the resulting percentage by $30 million to obtain a company's "fair share" amount.

Third, there was nothing in the consent decree requiring settling generators to pay their "fair share" of the Government's administrative costs.

Fourth, the Government did not allow nonsettling generators the opportunity to settle on the same terms—a fact which is not in the public interest of obtaining the maximum amount of funds from the largest number of parties and to encourage voluntary cleanup.

Another area of inquiry by this committee centers on why this company did not accept the Government's cash-out offer. The reasons were several-fold and include the following:

First, the offer to nonsettling generators did not take into account the amounts to be received from the settlement with the nonsettling generators—excuse me—with the settling group of 24. The amount of money needed for surface cleanup was essentially reduced from $15 million to $7,723,000, the amount paid by the 24 companies, but there was no corresponding reduction in the total cleanup costs on which the shares of the nonsettling generators were based.

Second, no basis was given by the Government to support its estimate of $15 million for a ground water cleanup.

Third, no consideration or credit was given for that material sent to the site, reclaimed, and then sent back to Stewart-Warner.

At the time the offer was made, Stewart-Warner was not persuaded that it had violated any law. It had been using, and continues to use, methods of reclamation and disposal which were and are considered appropriate, proper, and lawful.

The decision to accept or reject the Government's pro rata offer must be viewed against the lack of available criteria for evaluating the alternatives. At the time of the offer, there were no court decisions interpreting the Superfund Act, and the legislative history of Superfund was ambiguous and inconsistent.

Stewart-Warner, as is any potentially liable party under CERCLA, is given certain defenses under section 107 of that act which are applicable to its situation. It was thought at the time, and still is, that these defenses are applicable to our set of facts at the Seymour site.

For these reasons and the belief that a fair settlement was justified, there was no logical reason for accepting the Government's offer.

It is Stewart-Warner's position that the appropriateness of EPA's pro rata settlement approach depends on a number of factors. Those factors include the ability of EPA to demonstrate a company's contribution to a discharge, release, or disposal of hazardous waste separate and apart from that of other contributors; the amount of a company's hazardous wastes involved; the degree of toxicity of the hazardous wastes involved, the degree of involvement by each company in the generation, transportation and treatment, storage or disposal of hazardous waste concerned, taking into account the characteristics of such hazardous wastes; the degree of cooperation by companies with Federal, State, or local officials to prevent any harm to the public health or the environment; and the possible contributory negligence of State and local officials.

With respect to possible changes to be considered in administration of Superfund, Stewart-Warner suggest a revision in the hazardous waste ranking system which would give credits for voluntary cleanup. Stewart-Warner also would suggest a more intelligent RI/FS program which would encourage private parties to do studies or, if the Government conducts a study, allow for company participation.

Stewart-Warner concludes by stating that while it is committed to following the laws as they are now written, at least fairness and equity have been lacking in the implementation by EPA in the Seymour situation.

Thank you for the opportunity to testify on these issues today.

[The statement of Mr. Jackson follows:]

TESTIMONY OF J. CHRISTOPHER JACKSON

Mr. Chairman and Members of the Committee on Public Works and Transportation, my name is Chris Jackson, an attorney employed by Stewart-Warner Corporation.

Stewart-Warner Corporation, whose corporate headquarters is located in Chicago, Illinois, consists of eleven operating divisions and subsidiaries. One of the divisions is the South Wind Division located in Indianapolis, Indiana. South Wind is a manufacturer of heat transfer equipment and combustion heating devices, and it is waste from that division which found its way to the Seymour site. With that brief background, I would like to address some of the matters being reviewed by your committee.

Stewart-Warner did not participate in the October, 1982, Seymour Recycling Corporation (SRC) settlement negotiations. The settlement entered into between the Government and the IBM/TOPOL group of twenty-four companies on or about October 26, 1982, was a surprise to Stewart-Warner.

It was the position of Stewart-Warner at the time, and still is, that the agreement and subsequent consent decree, entered into between the so-called "gang of twenty-four" and the Government was patently unfair, inequitable and should not have been allowed by the Court under the circumstances.

In September, 1982, Stewart-Warner was one of several companies which attended meetings with the Government in Indianapolis, Indiana. Specifically, Stewart-Warner was present in Indianapolis, on September 10, 1982, when the Government gave a brief overview of the Seymour site, announced that no one had undertaken voluntary cleanup action and that all parties would shortly be served with a demand to pay a pro rata share of the cleanup. EPA had established the costs of the cleanup to be $30 million; $15 million for the surface and $15 million for the subsurface.

In Stewart-Warner's view the consent decree entered into by the Government and group of twenty-four companies was unfair several reasons, which include:

1. The Government singled out twenty-four companies for settlement on favorable terms after long and arduous negotiations. The remaining generators were given a "take it or leave it" offer with little time to do anything but accept or reject.

2. The settling group of twenty-four generators paid less than their proportional "fair share" based upon the Government's estimate of total cleanup costs. A company's "fair share" was arrived at by the Government in the following manner: It took the total tonnage of waste its records showed were shipped to the site by a given company and divided it by the total tonnage of waste at the site. It multiplied the resulting percentage by $30 million to obtain a company's "fair share" amount.

3. There was nothing in the consent decree requiring settling generators to pay their "fair share" of the Government's administrative costs.

4. The Government did not offer non-settling generators the opportunity to settle on the same terms—a fact which is not in the public interest of obtaining the maximum amount of funds from the largest number of parties and to encourage voluntary cleanup.

Another area of inquiry by this Committee centers on why this company did not accept the Government's cash out offer. The reasons were several fold and included the following:

1. The offer to non-settling generators did not take into account the amounts to be received from the settlement with the non-settling generators. The amount of money needed for surface cleanup was essentially reduced from $15,000,000 to $7,723,000, the amount paid by the twenty-four companies, but there was no corresponding reduction in the total cleanup costs on which the shares of the non-settling generators were based.

2. No basis was given by the Government to support its estimate of $15 million for a ground water cleanup.

3. No consideration or credit was given for that material sent to the site, reclaimed and then sent back to Stewart-Warner.

At the time the offer was made, Stewart-Warner was not persuaded that it had violated any law. It had been using, and continues to use, methods of reclamation and disposal which were and are considered appropriate, proper and lawful.

The decision to accept or reject the Government's pro-rata offer must be viewed against the lack of available criteria for evaluating the alternatives. At the time of the offer, there were no court decisions interpreting the Comprehensive Environmental Response Compensation & Liability Act (CERCLA), and the legislative history of CERCLA was ambiguous and inconsistent. Stewart-Warner, as is any potentially liable party under CERCLA, is given certain defenses under Section 107 of that Act which are applicable to its situation. It was felt at that time, and still is, that these defenses are applicable to our set of facts at the Seymour site.

For these reasons, and the belief that a fairer settlement was justified, there was no logical reason for accepting the Government's offer.

It is Stewart-Warner's position that the appropriateness of EPA's pro-rata settlement approach depends on a number of factors. Those factors include the ability of EPA to demonstrate a company's contribution to a discharge, release or disposal of a hazardous waste separate and apart from that of other contributors; the amount of a company's hazardous wastes involved; the degree of toxicity of the hazardous wastes involved; the degree of involvement by each company in the generation, transportation, treatment, storage or disposal of the hazardous waste concerned, taking into account the characteristics of such hazardous waste; the degree of cooperation by companies with federal, state, or local officials to prevent any harm to the public health or the environment; and the possible contributory negligence of state and local officials.

With respect to possible changes to be considered in administration of Superfund, Stewart-Warner suggests a revision in the hazardous waste ranking system which would give credits for voluntary cleanup. Stewart-Warner also suggests a more intelligent RI/FS program which would encourage private parties to do studies or, if the Government conducts a study, to allow for company participation.

Stewart-Warner concludes by stating that, while it is committed to following the laws as they are now written, it believes fairness and equity have been lacking in the implementation by EPA in the Seymour situation.

Thank you for the opportunity to appear and testify on these issues today.

Mr. LEVITAS. Thank you very much, Mr. Jackson, and all of you. As I anticipated, we got a slightly different view of the settlement this afternoon from that which we got this morning.

Let me ask all three of you a preliminary question, which I would like to understand. Why did not Alcoa, Monsanto, or Stewart-Warner appear before the district court and object or protest the proposed consent decree?

Mr. JACKSON. Could I respond?

Mr. LEVITAS. I want all of you to respond.

Mr. JACKSON. Mr. Chairman, I happened to be present in court on November 30, 1982, when Judge Steckler heard that testimony. If you would look at the record in that case, I believe attorneys from Jones Transportation, Union Carbide, and Eaton Corp. spoke up at that particular hearing in front of the judge and voiced most of the concerns, or all of the concerns, that certainly this company would have had.

I did not anticipate testifying at that point, but I would say that our interests were at least voiced to Judge Steckler by three other representatives.

Mr. LEVITAS. Mr. Harness. How do you pronounce your name, by the way?

Mr. HARNESS. It is Harness.

Mr. Chairman, I don't really have a good answer to give you on that. We had people at that hearing, and we sort of found ourselves in a delicate position. We didn't want to obstruct cleanup, and I would add, I don't wish to throw any parties to the 24, I suspect if they had not undertaken that effort, those drums would have been sitting there a long time.

We felt the overall management of the whole matter was pretty poor, and I think you raised a good point, and I can't give you an answer other than we just chose not to at the time.

Mr. LEVITAS. Dr. Atkins.

Dr. ATKINS. We too were present at that hearing, but we chose not to speak because we had made the assumption that we had not at the time received formal request from EPA for the cash buyout or from the Department of Justice—we would make a similar suggested settlement, a two-part settlement on the same terms of the group of 24 and that would be a fair way to approach the whole recycling cleanup.

It turns out we were not correct in assuming that what was going to be approved for that group would be included for other groups.

Mr. LEVITAS. We have heard about the IBM/TOPOL group, which is called the "group of 24," the small group of generators. But there was another group, a larger group that was identified in documents I have seen as the Bayh group, B-a-y-h, of generators represented by former Senator Birch Bayh, who had been engaged in some negotiations.

Were any of the three of your corporations involved as part of the Bayh group?

Mr. HARNESS. Yes, Mr. Chairman. Monsanto was aware of that group in—I don't have all of the details as to how that group was formed and when it met and so forth. But my understanding—in fact, I am quite certain of this—is that group preceded and in fact ultimately led to the formation of the group of 24.

We received a letter from an attorney from IBM in April, dated late April 1982, inviting us to become part of a group that was in-

volved with former Senator Bayh in trying to develop a cleanup proposal. We have participated in some of those discussions with some of the members of that group in various forums. And this really was the first point that I mentioned in my statement. We chose at that time not to participate with that group.

Mr. LEVITAS. With the Bayh group?

Mr. HARNESS. That's right, because it is my understanding that that is the group that ultimately—and I believe you heard some of that testimony this morning—led to the formation of the group of 24. That Bayh group, for whatever reason, was not successful in bringing together any kind of a joint program, and then that led to the idea, "Let's divide the program in two." And Mr. Topol talked about it at some length this morning.

Mr. LEVITAS. It is my understanding, based on testimony I have heard and documents I have read, that there was this larger group known as the Bayh group, and they were making proposals for settlement, which were cash payments of about $8 million approximately, and they wanted the city of Seymour to participate. And the Justice Department finally turned them down.

And after one of their meetings of the Bayh group, and there had been a series of them sometime in May or June, I think it was, late May or early June, that after one of those meetings broke up, Mr. Ramsey of the Justice Department and Mr. Topol had a conversation which led to the creation of a different smaller group, different in the sense that it was smaller, made up of some of the people who were part of the large group.

Now, what I am trying to find out is did Monsanto or Stewart-Warner or Alcoa participate in that larger group, the Bayh group? You have indicated from Monsanto's point of view that you were sort of in and out.

Mr. HARNESS. We participated, but then when the time came to committing to further involvement, in fact, they actually asked for a letter of commitment from I don't know how many other companies, but they asked for that letter of commitment. And we declined on the basis that we had to that point not been notified by the Government as to our involvement and second, had no basis for understanding what claim would be made against us.

I might add that we received on May 20, 1982, the actual letter from the Government naming us as potential responsible parties. So the time period was very close.

But I think you characterized it, sir. We were in, but then we elected to drop out.

Mr. LEVITAS. Had you received, and if so, when, a letter from EPA notifying Monsanto that they were potentially responsible, a potentially responsible party?

Mr. HARNESS. We received on May 20, 1982, a letter from—I believe it was from the Department of Justice, but it could have been from EPA—notifying—the letter was dated May 14, 1982.

Mr. LEVITAS. And was that the first information that you had had that you were going to be involved somehow, or had been sort of——

Mr. HARNESS. Well, it is my understanding—and I have to admit, sir, that I was not directly involved at that particular time—but

there was a list of parties that had used the site, and that was used to develop this first group that began meeting.

Mr. LEVITAS. Which actually preceded the notification that you got from the Justice Department?

Mr. HARNESS. That is correct.

Mr. LEVITAS. OK.

Now, Mr. Jackson, what about Stewart-Warner?

Mr. JACKSON. Well, with regard to Senator Bayh's group, or former Senator Bayh's group, we tried to monitor that by telephone, but we did not attend any meetings. And I in reviewing my files don't see any correspondence that we were officially invited to some of those meetings.

Now, after some of them took place, we tried to telephone Mr. Bayh's law firm to find out what had happened, and then I think we got notice of another meeting. But we didn't know anything about the particulars of what this group was really trying to do, and probably didn't get into the full gravity of the situation at that time before we got the letter from the Department of Justice.

Mr. LEVITAS. Dr. Atkins, how about Alcoa?

Dr. ATKINS. Our legal department tells me they were aware that some meetings were going on with the group, and I don't—I am not certain that they called it the "Bayh group," but they were aware of it.

Our records indicate we were never invited to attend. I guess there was a network of lawyers that communicated with one another. So we did not attend, and in fact until May 14, 1982, we did not know what our involvement was in the site. And our response to the Department of Justice after receiving letters dated May 14, 1982, was that we would like to talk to you more about what our involvement was and determine a course of action that Alcoa should take. So that is how we were trying to obtain information about the Seymour site through the Department of Justice.

Mr. LEVITAS. All right.

Now, Mr. Harness, as I understand Monsanto's position, where it was coming from is that in early 1982 you were involved with some of the other companies in this sort of informal group, which apparently was the Bayh group, but you didn't really pursue it very much because there wasn't any information from the Government as to what your responsibilities were or how much was at stake. And then you sort of, as you say in your statement, withdrew from the group. Subsequently, on May 20, you got this notification from the Justice Department or EPA that you were a potentially responsible party.

Subsequently—this is now during the summer of 1982—Mr. Topol says he called up Monsanto and says, "Look, I have got this small group of generators, and we're going to make a deal with the Government on this. How about joining up?" And at that point or shortly thereafter, Monsanto says, "No way."

Is that a fair characterization?

Mr. HARNESS. Let me just elaborate a little. But that is, I think, the way it happened, yes. I wasn't directly involved in the conversation Mr. Topol talked about this morning, so I can't tell you exactly when that happened. But let me give you just a little bit of elaboration on your summary.

On May 20, 1982, we received a notice from the Department of Justice that we were in their view a PRP, and asked that we commit to a study, and there was the threat of a lawsuit under CERCLA in that letter.

On June 7, 1982, we sent the reply to the EPA Task Force per the instructions in that letter from DOJ, saying, "Well, OK, tell us how we are involved," because like most of the others I am sure that you have heard from, Seymour—we used Seymour as, for all intents and purposes anyway, as a recycling recovery site incineration. We wanted to know just how they were basing their claim.

We weren't protesting our involvement, so to speak, but we did want to know more about it. And so we asked for evidence of our involvement and to what extent we were involved. And I must assume that the conversation that Mr. Topol talked about occurred during the summer. In fact that——

Mr. LEVITAS. Who was the attorney for Monsanto who was sort of heading up all this effort?

Mr. HARNESS. A fellow named Phocion Park—P-a-r-k.

Mr. LEVITAS. And is he still with the company?

Mr. HARNESS. Yes, indeed, he is. I must assume, as you said in your statement, that that conversation took place in the summer. And I would point out to you that it was not until September 8, 1982, that we received the documents from the Government stating the basis on which they had made the determination that we were a PRP and stating their estimate of how we were involved.

Mr. LEVITAS. But by that time, as I understand it, Monsanto had already declined the IBM/Topol offer to participate in the group.

Mr. HARNESS. Our attorney falls a step short of calling it an offer. He—there was discussion, there's no question, and I am not trying to dispute what Mr. Topol said. There was discussion, but at that time it was not a group of 24, it was not an offer. It was just, "Do you want to participate further?" At least that's the best that I can surmise. And we said, "No." That's about the extent of it. We said, "No."

Mr. LEVITAS. First of all, at this point I will put in the record, without objection, copies of letters written to the Justice Department and the Environmental Protection Agency from different parties in one form or another protesting the small-group IBM/Topol settlement arrangements. And I think it is important to get that in the record.

Let me read you a copy of a letter from Mr. Phocion Park, your attorney, to Mr. Ramsey of the Justice Department on September 21, 1982. And he says to Mr. Ramsey:

> We have just learned that negotiations are underway between the Government and the small group of generators for possible settlement of the Superfund liability on a basis different from that which will be provided to the remainder of the 430 Seymour parties. Monsanto hereby requests that it be provided the opportunity to participate in the settlement offer which will be made to the small group of companies.

We're beginning to get some contradictions in position now, because Mr. Topol's testimony, as I recall, was very specific today. He said that he called, personally spoke with, had conversation with, somebody at Monsanto; there was some back and forth. He invited them to be part of this group. And this, we're talking now the

summer of 1982, before the September date, because in September you were notified of something about pro-rata share. Mr. Topol proceeds to say that—as I recall it—not only did Monsanto say, No, we don't want to be part of your group, but from essentially that date to this, he had never heard anything from Monsanto to the contrary about wanting to be part of that group. Now, that is my recollection.

Mr. HARNESS. Well, I don't quarrel with your recollection, sir. I think it is accurate. I don't really believe——

Mr. LEVITAS. But that is contrary to this though.

Mr. HARNESS. Let me see if I can clarify it. I don't think—I think with a little explanation it won't appear contrary. I just hope so.

Mr. LEVITAS. Excuse me for a moment, Mr. Harness, and let me tell you why I am assuming this, really. Then I am going to get back to Dr. Atkins and say apparently Alcoa passed up a good deal someplace along the line there. Or you never got the offer again.

What I am trying to figure out is this: Monsanto was afforded an opportunity to get in on the fifty cents on the dollar operation rather than on the dollar-for-dollar operation, but made the decision not to. Mr. Topol suggests to us that he didn't understand why, but he just made the offer, and it was turned down. And now Mr. Park, in September, is saying he's just heard about it. He says: I have just learned that negotiations are underway between the Justice Department, Mr. Ramsey, and a small group of generators and we want in.

Mr. HARNESS. Let me respond with two points, Mr. Chairman. First of all, Mr. Topol could not have made a specific offer to Mr. Park because he stated this morning that he didn't have the final offer which resulted in the $7.5 million figure until the very end of the negotiations late in October 1982. I think it is clear that Mr. Topol did talk to Mr. Park and talk about whether we would be interested in pursuing with a small group the same approach that had been tried with the so-called Bayh group. And for a variety of reasons, some of which we may be sorry of, we said: No.

The second point is that after the August, I'm sorry, after the November 10 meeting, which EPA and the Department of Justice conducted with all parties, there were very clear assurances made that all parties would be given an opportunity to settle on the same basis. At that time we did not and were not part of the party of 24 which had been formed by that time. We were not participating in—we didn't know the party of 24. We only knew of this group that was beginning to carry on so that the actual firm offer that you mentioned could not have been made because Mr. Topol—to repeat myself—Mr. Topol did not have that price until the very end.

Mr. LEVITAS. I wasn't meaning to imply that he was saying: Here's the deal. Do you want to buy into it? As I understood it, Mr. Topol said: We've got this group together. Do you want to be part of it? We are working toward——

Mr. HARNESS. That's right. And we declined.

In late August, mid-August, we received an invitation from the Department of Justice to a meeting of the PRP to be held on September 9 and 10. We attended the meeting on September 10. At that meeting, we were given very firm assurance that all parties

would be given an opportunity to settle on the same basis. And subsequent to that meeting, we learned specifically of the pending, developing deal between the group of 24. And that's the point at which we rejected—I'm sorry, objected—and that is the fact led to Mr. Park's order of September 17—or 21, I'm sorry, which you have before you.

Mr. LEVITAS. Yes. And to further corroborate what you have just said, on November 4, Mr. Park sent a letter to Assistant Attorney General Carol E. Dinkins. Now this is after they have——

Mr. HARNESS. Protesting the——

Mr. LEVITAS. And he is, at this point, protesting the fact that this settlement is completely contrary to the statements and commitments made by the Department of Justice and EPA personnel to the generators at meetings called by the Department of Justice and EPA on September 9 and 10, 1982, to discuss liability of cleanup. At those meetings, Government personnel stated that settlement offers would be made to all generators on the same basis and would be received by the end of September.

Mr. Jackson, you were at those meetings, weren't you?

Mr. JACKSON. In September in Indianapolis?

Mr. LEVITAS. Yes, sir.

Mr. JACKSON. Yes, sir.

Mr. LEVITAS. Is that your recollection?

Mr. JACKSON. That similar offers would be given to all of us?

Mr. LEVITAS. Yes.

Mr. JACKSON. Yes. I believe that is right.

Mr. LEVITAS. Since the Government didn't do that that they made fraudulent representations to you which would provide the basis for setting aside that court approval, this consent decree?

Mr. JACKSON. I don't think I would go that far in a characterization. You know, they may have misled us, but I wouldn't go——

Mr. LEVITAS. They broke their word.

Mr. JACKSON. Yes.

Mr. LEVITAS. They broke their word. Let's put it that way.

Now my next question is—and then I'm going to stop, this is getting much more interesting as we get into it.

Mr. JACKSON. I've got a couple of questions, too.

Mr. LEVITAS. I can imagine.

Dr. Atkins, when I read your testimony and heard you today, you make the point that your pro rata share, Alcoa's pro rata share, was higher than others who had greater volume of waste.

Dr. ATKINS. Yes. That is our understanding.

Mr. LEVITAS. And that you paid more as a result thereof.

Dr. ATKINS. We paid. As the information in the letter to us says, we were the 6th highest payer but the 24th largest generator.

Mr. LEVITAS. Do you know how that could have happened, or how that happened? I mean, you would have been better off, Alcoa should have bought into the $100,000 award club.

Dr. ATKINS. We were never made aware of that. We were not made aware that that deal was going on and we had no opportunity to buy into that. We did not understand that this group or selected group of 24 companies were involved in developing its own compliance program.

Mr. LEVITAS. Do you think there's been some kind of injustice done to your company as a result of the way this was handled?

Dr. ATKINS. We feel that the settlement is unfair and that we are paying twice as much as the settling group.

Mr. LEVITAS. I've got a lot of questions, but I'll stop at this point and recognize my colleague from New York.

Mr. MOLINARI. Dr. Atkins, you were present this morning when the other witnesses testified, were you not?

Dr. ATKINS. Yes. I was.

Mr. MOLINARI. I think if I understood correctly from Mr. Topol and others that the way this group of 24 that was put together was that they took the list of generators in priority order of generation of the quantity of waste that was taken to the site. Now, if that were the case, and 24 was the number, and you ranked 24th, how do you account for the fact that you were not invited?

Dr. ATKINS. That is a mystery to me. I can only assume that if an attempt were made to contact us, it was unsuccessful and they went to the next person on the list.

Mr. MOLINARI. I'm sure you have looked at the list of the 24 settlors.

Dr. ATKINS. I cannot recall seeing the list of the 24 settlors, but I have a good idea of the companies that are on the list.

Mr. MOLINARI. Well, I am somewhat surprised because, in fact, the claim is being made today by you and others that you were left out of the deal. I would think that you would have looked at the list to see the relative rankings of the other corporations to see if, in fact, an injustice was done to your corporation.

The understanding that we have is that Topol was trying to put together a group of generators representing 50 percent of the waste transported to the site.

Dr. ATKINS. That is my understanding as well.

Mr. MOLINARI. They started at the top with the largest generator and worked their way down.

Dr. ATKINS. And I have seen the listing, the EPA listing by volume and I know where Alcoa and its subsidiaries rank in that list—we are 24th on that list.

Mr. MOLINARI. How about Waste Resources of Tennessee? Do you know how much they generated?

Dr. ATKINS. I am sure they are very far down on that list.

Mr. MOLINARI. Very far down.

Dr. ATKINS. In fact, I was looking at the list this morning to see how far down they were, and I did not find their name on the list. But I remember testimony this morning about that group.

Mr. MOLINARI. Do you know the 24 corporations that are settlors?

Dr. ATKINS. I do not.

Mr. MOLINARI. If I showed a copy of the list to you, do you think you would recognize the rankings of some of these?

Dr. ATKINS. I could tell you compared to the list that I have. Yes.

Mr. MOLINARI. Why don't we do that. Do you have a copy of the list?

[Pause.]

Mr. Jackson, would you like to offer something?

Mr. JACKSON. No. I don't have any comments. I have some questions I would like to get to at some point.

Mr. MOLINARI. Maybe we'll ask the chairman to help you.

Dr. ATKINS. Is this listing in the order of size? For example, is International Business Machine the largest and Waste Resources of Tennessee the smallest?

Mr. MOLINARI. That is my understanding, but I would have to look to staff for confirmation.

Generally it is in the order of priority. Yes.

Mr. JACKSON. According to the list I have, Alcoa would fall about half way down that list someplace around McDonald Douglas or Dow Corning Corp., according to the list here.

Mr. MOLINARI. We may have a very serious charge then that, they didn't, in fact, examine the list as they claimed they did, in the order of volume generated to the site.

Can anybody else here on the panel offer any further assistance on that score? Was either one of your companies treated the same way? You wouldn't fall into that same category, would you? Well, you would, obviously, Mr. Harness. I take it we have your answer on that.

Mr. JACKSON. I think I would have to look at his list, but I think that Stewart-Warner was 35th on the list, I believe, and they never got to us. At least, I am not aware of them getting to anybody in my organization.

Mr. MOLINARI. That wouldn't shock me. No. 24 would shock me. But maybe it would shock me now if we found somebody on that list that was lower.

Mr. JACKSON. I don't want to give a reason as to why, you know, Mr. Topol said what he did, but I do remember him saying that a number of small companies came to him and said that they wanted to contribute some money. A hundred thousand dollars or something that was the lowest amount they established. And maybe if several companies did that, maybe they didn't have to go very far down their list. I don't know. But I certainly don't want to put words in his mouth.

Mr. LEVITAS. Will the gentleman yield?

Mr. MOLINARI. Yes.

Mr. LEVITAS. Were you involved above or below on, the list there, RCA?

Mr. JACKSON. Pardon me?

Mr. LEVITAS. Were you above or below RCA?

Mr. JACKSON. Oh, I would have to——

Dr. ATKINS. This is the EPA list I'm handing down to him, dated the 10 of September.

Mr. JACKSON. We are below RCA on this list. They were the 21st.

Mr. LEVITAS. And what about Penwalt Corp.?

Mr. JACKSON. We were above them. They were No. 49 on this list.

Mr. LEVITAS. All right. Well, according to the list I'm looking at, Penwalt begins the list of the $100,000 Club. And there are—one, there's Penwalt Corp., Owens Illinois, Procter & Gamble, General American Transportation Corp., American Can, Olin Corp., A.M. General Corp., Cummins Engine Co., NCR, and Waste Resources of

Tennessee, all in the $100,000 Club, which, I take it, would be below you.

Mr. JACKSON. I take it it would be; I would have to look to be sure.

Mr. MOLINARI. Mr. Harness, I notice you have indicated in your statement that your company, Monsanto, retained one consultant and you sought a proposal from another, and that you made a number of specific proposals to the Government. I assume you are talking about the Federal Government, either the EPA or the Department of Justice.

Mr. HARNESS. That is correct; both EPA and the Department of Justice.

Mr. MOLINARI. Could you describe for us what some of those specific proposals were by memory?

Mr. HARNESS. Yes. After we rejected the Government's final walk-away offer, which was the November 29 final settlement date, we sent the letter to the Department of Justice, rejecting the offer and offering to settle at the same basis as the other parties, and also offering to bring in the remaining parties as best we could in a subsurface cleanup program.

We met with some of the other parties in January 1983, and then had a meeting with EPA and the Department of Justice in Chicago on February 1. That was the first offer. At that time we brought several people from our staff, and we laid out a study program that would involve doing a ground water assessment study, and then our estimate as to how we would proceed. We didn't have a specific plan at the time, because we felt the ground water study, itself, would be necessary to take first; but we laid out a program to proceed over a period of—if my memory serves me—about 18 months, to try to finish the final job; 18 months to 2 years we felt it would take.

We didn't hear any response from that until early July 1983, and we were rejected. And the reason for rejection—let me give you a little chronology here—the reason for rejection was that it did not guarantee an "assured"—quotation marks—cleanup. So, we urged the Justice Department to reconsider before beginning with the litigation on the program, and, in fact, we then——

Mr. LEVITAS. Excuse me, if you don't mind.

What do you understand that to mean, that it didn't guarantee an assured cleanup? You were, in effect, proposing the same type of arrangement that they had made with the IBM/Topol group, weren't you—the $15 million which they had ascribed to the subsurface or ground water portion of it, and said that you would put half of it up and be responsible for the other half.

Mr. HARNESS. I would have to be fair and say that we hadn't gotten quite to that point. I'm going to get to that point.

Mr. LEVITAS. OK.

Mr. HARNESS. But at that time we had laid out an approach, a concept, and said we would pay for the study——

Dr. ATKINS. We did that.

Mr. HARNESS [continuing]. Similar to the same that Alcoa did.

Mr. MOLINARI. May I interrupt for a moment, please?

We heard this morning that you can't really do an assessment of the ground water problem until the above-surface cleanup had been completed.

Mr. HARNESS. That is correct, and that was part of our plan. We would start as soon as the surface——

Mr. MOLINARI. I wanted to be sure of that.

And, Dr. Atkins, is that your understanding as well?

Dr. ATKINS. I would not agree wholeheartedly that you could not assess the ground water situation before the surface was cleaned up. If you carefully set your wells and made certain you sampled properly, you can determine the subsurface conditions while the surface conditions exist as they reasonably were.

Mr. MOLINARI. Did you give it some thought at the time, Dr. Atkins?

Dr. ATKINS. We assumed that if EPA did accept our offer to do the subsurface as the surface program was being done—they would be done simultaneously—at least the assessment could be done and the assured portion of our subsurface buyout for that program could be underway.

Mr. MOLINARI. Now, do you have any idea as to what that testing analysis was going to cost? Do you have any figures from consultants as to the cost of that work?

Mr. HARNESS. At the period of time that I mentioned, early 1983, we were estimating $200,000 to $300,000 to perform that work—that was just an estimate——

Mr. MOLINARI. It was just your own estimate, not a consultant's figure?

Mr. HARNESS. That is right. And that we were going to go out and seek some estimates to do that. But we wanted to get some assurance from the Government that we could proceed on this program. And my idea that this has been a major part of the problem in that it's difficult, it's sort of a chicken-and-an-egg situation; the Government wasn't going to give us, at least apparently wasn't going to give us, any assurance to proceed unless we had a definition of what was clean. And they had no definition of what was clean to give us in order that we might proceed, if that makes sense.

Mr. MOLINARI. If Dr. Chu was right, then you may well have made the right decision, not the wrong decision.

Mr. HARNESS. If you'll let me proceed——

Mr. MOLINARI. Please.

Mr. HARNESS [continuing]. I'll get to some statement about that, anyway. I'll be quick about this.

We later that year—after receiving their rejection to our first discussion we exchanged some letters back and forth, telling each other that the other side was wrong, and then, in September, made another offer. In fact, this time we actually sent a check. We sent a check for half of our amount on the basis of 50-cents-on-the-dollar settlement being equal with the first group. And that, as we probably suspected, was rejected.

But our letter with that check included an offer that we would pay more if the actual costs were higher, in fact, we'd pay our fair share, and we would again offer to be instrumental in bringing a settlement. That was returned to us in October of that year, but

not before we had a meeting with DOJ, again in early October, and again after meeting with a group of the other PRP's, to try again to convince them to let's proceed with this kind of a study basis.

The whole thing was rejected again because we didn't have a guaranteed cleanup proposal—I'm going to interpret what we heard from them; it so happened that I wasn't at that particular meeting, I was at the first one—"guaranteed" meaning two things: We didn't have the money guarantee—which the party of 24 did, they had enough parties together to fund what they said they were going to do—and second, we didn't have a definition of "clean" and we didn't have a program that would get us there.

So, that was our next step, and that led to the hiring of a consultant. And we did hire a consultant, and we asked the consultant not to do a $250,000 study but to do a review of the literature or the data available. And as Dr. Chu pointed out earlier, there is some data available. When the site was initially named in the Government action of early in 1980, there was a contract given to studies of ground water—take some samples—and while it wasn't conclusive, it did give a profile of the amount of contamination around the site.

And just to give you a little bit of the picture, you have to picture this site, and there were some wells on the site, and there were some wells upstream and downstream of the ground water flow. There were some samples taken and some analyses run, identifying what was in that ground water.

On that basis the contractor came back with some ideas, from which we formulated a program. It was really a four-part program—if I can remember all the parts. We were going to provide a water supply to the residents of the nearby community, not because—and I would emphasize this—because there was a feeling of eminent danger—in fact, that's been brought out several times today, that the wells weren't contaminated at that time—but because it seemed prudent, because if there was some contamination in the ground water and it was going to move that way, so it was a prudent thing to do and no one seems to have disputed that.

Second, we would truly pump and treat on site the ground water for some period of time until—at least in the initial estimate—we thought it would be adequate to remove the contamination. And that was going to involve setting up a small treatment facility on site and pumping several volumes—two, I think we had figured—of ground water well out of that area.

Third, we were going to put a clay cap over the surface after it was cleaned up, to prevent any rainfall to add to the remaining dirt that was there and for any percolation to occur.

And then, fourth, we were going to study to be sure that there weren't any subsurface contaminated areas that remained, any drums that were buried or anything, and if there were, we would have them removed.

That proposal was rejected. It didn't define clean, it didn't address the contamination that was alleged to have occurred in the deeper aquifer, and suggested at that time that we should define what is clean—the Government suggested.

So, we proceeded to do that. We asked the Government if they would give us the data, all the data that they had on ground water

contamination, and we went through a study comparing whatever pollutants could be identified from those reports with various criteria, like water criteria which this committee is familiar with, and that sort of thing, and made some preliminary grid, if you will, as to how we might look at contamination against nine criteria for water quality.

We then looked at the same kind of proposal that I outlined before, with some possible variations. We could treat on site, we could treat at the city of Seymour treatment works—meaning we could treat outside to remove some contamination. And I would add, this initial look did not identify massive contamination. There were some pollutants identified, but as Dr. Chu pointed out, it—I would agree with his assessment rather than trying to repeat it all—it wasn't a massive amount, but there were some things that we would look at. We would treat on site for a while or we could go directly to treatment at the Seymour Treatment Works.

And we talked with them and they seemed reasonably agreeable to that. We were going to provide financial arrangement within the overall program to do that. We talked with PRP's and we had general agreement from people. And I might ask Mr. Jackson if he would agree with this, but we had general agreement from enough people that gave us some reason to believe we could proceed with such a plan. And this was a program that—there were still some variables to be defined, but we were looking, certainly, less than $10 million and probably closer to $5 million to conduct the entire cleanup plan. And with the money that we felt we could generate from the remaining parties who were interested in participating, plus the money that had been collected already for the subsurface settlement, we felt that there would be adequate money available to pay. And we again offered to the Government that we not only—we'd pay our fair share of the total subsurface effort.

And that kind of, then, leads to the most recent set of meetings. In between I should add one last point.

In early December the Justice Department filed a motion to amend the complaint and add 55 parties to the lawsuit. And that motion was granted in early January. That leads us up to the most recent series of meetings I talked about, and the whole thing seems to have stalled a little bit again.

Mr. MOLINARI. It is a fact, is it not, that the quicker you move to do a subsurface cleanup the less it would cost?

Mr. HARNESS. Could you repeat that? It is a fact, did you say?

Mr. MOLINARI. Is it a fact that it is cheaper to move as expeditiously as possible to do a subsurface cleanup before the plume starts to disperse? The wider the dispersal area the more expensive the cleanup; that's the impression that I received.

Mr. HARNESS. I would agree that it would be better, if there is ground water contamination at a site, it would certainly be better to do the cleanup prior to the plume dispersing. But in this case, there was no immediate threat to anyone that we could identify. The plume doesn't seem to be moving that quickly nor does it seem to be that heavy in contamination. And while I won't disagree with Dr. Atkins that you can do an assessment, we felt it was prudent to complete the surface assessment—or surface cleanup—first, and

then proceed with drilling some wells on site and wells off site and analyzing the data that we'd get from there.

So, we would want to move as quickly as possible, but I go back to our original proposal in February. In that time, as I recall, it was being estimated that by mid-to-late 1983, surface cleanup would be completed. And I think they weren't too far off from that; I don't recall exactly when it was completed. But our proposal would be to go in and start doing the assessment immediately thereafter. So, we would be well into the finishing the assessment and beginning to define or even implement the cleanup program.

Mr. MOLINARI. OK. Now, we have been told that the surface cleanup is finished. Do you agree with that?

Mr. HARNESS. I think that is hard to agree or disagree, sir, because there was never any definition of what clean would be. There was a decision to remove all the drums and to clean a foot of the ground.

And I think that is the point that I was trying to make when I stated in my statement that the division of the work between surface and subsurface was arbitrary. I don't disagree with Dr. Chu's statement this morning, that you have to proceed in a phased program. You really have to cleanup the surface first and then proceed with the subsurface. But where does one start and the other stop?

Mr. MOLINARI. Now, we are talking about, whether we like it or not, two phases of settlement which the Government has encouraged.

Mr. HARNESS. No.

Mr. MOLINARI. We're told it is a fact the first phase has been, completed, and 24 settlers have paid their distributive share. From that aspect of it, they would lead us to believe that phase 1 was completed.

Mr. HARNESS. May I comment on that point?

Mr. MOLINARI. Sure you may.

Mr. HARNESS. I stated that I felt that there is some logic to a two-stage cleanup program, but I fairly, clearly—carefully, at least—tried to put into my statement that we don't want to proceed with a settlement of the parties in two different groups. The point I believe I made was, let's give all parties an opportunity to settle at each phase. Some may choose not to, but let's let each party participate in each of the phases; in other words, dividing the problem into two phases from a cleanup stand point may make sense, but dividing the problem and saying "this group of generators will deal with this and this group will deal with that"——

Mr. MOLINARI. That is really the crux of the entire hearing.

Mr. HARNESS. That is right.

Mr. MOLINARI. But the point that I was trying to get to is this, that if 15 percent of what OTA said was the original amount that was supposed to be carried off site was actually taken off site, the remaining group is responsible for any further soil cleanup. If that is needed, it would seem to me that you guys have been had.

Maybe when you split it up among the numbers of parties that we have involved here, it doesn't amount to that much. But the question of fairness and equity is what is hammering away at me, and that is why I raised the questions this morning. It seems to me

you are giving one group the opportunity to buy out at a fixed price while they say, "We didn't really know when we agreed to be part of that group what that price was." They did admit, after my questioning, that they had a ballpark figure. They were close, maybe $1 million or $2 million, of what the final figure might be. But they had a pretty good idea of what their distributive share of that settlement was going to be before they went into it.

The question is, those who are remaining don't have the same assurances. We were listening to two different extremes. We heard Dr. Chu say that he can't conceive that the subsurface cleanup costs are going to exceed $1 million, yet OTA has given an estimate, and I read it not as a worst-case estimate but an estimate that it will cost between $20 to $40 million. Somebody's awfully right and somebody's awfully wrong.

Mr. HARNESS. I think we ought to put that $20 to $40 million into a little bit of perspective too, sir.

Mr. MOLINARI. OK.

Mr. HARNESS. I have the OTA statement. I read it this morning. And if I might, I would like to read this one sentence out of it: "A recent study for the Chemical Manufacturers Association indicates that for a site with the type and quantity of toxic waste such as Seymour, the costs of ground water contamination range from $20 to $40 million.

Now, there are a couple of things about that. First of all, I'm not quite sure the CMA never made a study of the site and never intended that $20 to $40 million to be applied.

Second, I am familiar with the kind of study they are talking about there. And I would say that, without commenting on the appropriateness of the $20 to $40 million number in general, it does not apply to this site because wastes, in mass quantities at least, were not buried at this site. If you had burial in enormous quantities of waste with subsequent contamination, that would be a different story than we have now. This was intended to be an incineration and waste recycling site. I don't want to quarrel, but there was not damage of environmental contamination and so forth. But I wish Dr. Hirschhorn were here, and I would take real exception with him for putting this statement in the record, because I don't believe it applies at all.

Now, what I have said earlier and what Monsanto has said, and what Alcoa has said, and what Stewart-Warner has said, and what a number of parties have said, is what should have been done in the first place is to do a definitive study of what the situation was, and then go back to the——

Well, I said that. I'm glad you gave me a chance to come back to that, because we've learned that we've changed our attitude on some of these things.

We wouldn't—in any kind of an opportunity to participate with generators now—bow out because the Government hadn't given us definitive information on how we were involved. We've learned that that was a mistake, and if given the chance to do it again, well, we'd participate; and, in fact, we are on some other sites. We'd still require some definitive statement as to what the problem is before we put our check in the mail.

Mr. LEVITAS. Would the gentleman yield?

Mr. MOLINARI. I yield.

Mr. LEVITAS. I made a note earlier about Monsanto in this matter, and I'm not trying to second guess anybody or engage in Monday morning quarterbacking, but it seems to me that Monsanto is approaching this type of hazardous waste site cleanup settlement litigation business in a traditional way that you would approach most litigation in most disputes, when, in fact, it is a whole different kind of ball game because of the complexities involved, because of the public's sensitivity, and because of the governmental role.

Now, was this the first major RCRA or potential Superfund action that Monsanto got involved in?

Mr. HARNESS. I can't absolutely say for sure. It was certainly among the first. And our approach at that time, as you characterized it very well, was a more traditional approach: If we are wrong we will pay our fair share of what the final cleanup is, but tell us what the situation is.

Mr. LEVITAS. Thank you. I appreciate that, because I think what you are saying is good advice for others who may come after you and face these types of situations. You can't approach the complexity and the type of litigation or settlement environment in a hazardous waste site as complicated as this one in the same way you do for, say, a conspiracy for a price-fixing case or something like that where you know what your share of the market is and you know how many blue jeans you sold and you figure out what your portion of the liability is. It is just a different kind of ball game.

Thank you.

Mr. MOLINARI. How much would it cost your company, if you were included in the TOPOL group? Knowing the actual costs, what would your pro rata share amount to?

Mr. HARNESS. Assuming it would have been on the approximately 50 cents on the dollar, it would have worked out to $660,000; which, by the way, is the amount of the check that we sent to the Government in September 1983.

Mr. MOLINARI. Which was rejected and sent back.

Mr. HARNESS. It was rejected.

Mr. MOLINARI. But if Dr. Chu was correct in his assumptions on subsurface cleanup—and you seemed to have no problem in his assessment—might not your share be substantially less than $660,000?

Mr. HARNESS. It might.

Mr. MOLINARI. Or a very small fraction of it?

Mr. HARNESS. I need the numbers that were a little higher than Dr. Chu's, but even if those numbers came through, yes, it could be less than $660,000. And we've stated all along that we'll pay our fair share of whatever the final cost would be. I can't see how anyone can find that unfair.

Mr. MOLINARI. It is certainly not unfair. I think the position that you've taken is most fair. I'm trying to put myself in the position of Monsanto. If somebody comes to you and they make this offer, you've got to make a judgment, you've got to rely upon those who have the expertise in your corporation as to what is happening. I think there are enough environmentalists out there to assure that the right things are going to be done, but I think it comes to a busi-

ness judgment answer. You sit down and say, "How are we going to cough it up? What is a better deal for us to take?" Also, we've heard corporations say they don't want to be named in a suit because that will hurt their image and the contingent liability factor doesn't help financial statements.

Is that part of the process that you go through in major corporations? I see Mr. Jackson is shaking his head in the affirmative, so I assume that that does or did actually occur.

Would you want to comment?

Mr. JACKSON. Well, sure. We tried to set that down in the CERCLA case. But I think the point was beautiful. This was the first site that Stewart-Warner was ever involved in, and I wish it had been the last, but this was unprecedented. And if you are a lawyer given kind of a conflicting and confusing legislative history as seems to be pointed out in light of these district court opinions and you don't have any opinions at the time the Government is saying take it or leave it, how do you advise your client? You're not exactly sure—at least from my standpoint.

Mr. MOLINARI. Also we are lawyers. My friend on the right here and I sympathize with the position you occupy. It is a difficult position.

Mr. JACKSON. It is a difficult judgment.

Mr. MOLINARI. I have no other questions.

Mr. LEVITAS. Let me just say this before I recognize Mrs. Johnson.

Mr. Harness, and I think for whatever it is worth from the perspective we are looking back on, and Mr. Jackson, I think stated it pretty well. Monsanto has, I don't say a reputation—maybe the word reputations fits—for being sort of hard-nosed in matters of this sort. I am not saying this in a pejorative way, but just saying, you know, Monsanto, I think you're the lead plaintiff in the pesticides disclosure case and a couple of other things of that sort, and what I am hearing in this instance is that here is the first, or one of the first—certainly the first huge, big, complicated multi-party all messed-up type of situation. And the Government, or even Mr. Topol who fairly or unfairly, right or wrong, took a very imaginative approach to this matter in which he said: "Look, I don't care how much it costs, I just want out of it. And that is what my client wants." It completely departed from the way in which a traditional litigation of this sort—litigation would be settled.

Where he wanted—just give me the parameters. What is the total exposure? What's my participation in this thing? And we'll work it out. And I think everything I am reading and hearing today tells me that that is where Monsanto came from in this situation. And I think—well, I won't say right or wrong, but I am most interested to hear your observation if it might be handled differently in retrospect now with as much as you know.

Mr. HARNESS. Well, I think you said it as well as I can. We came from that position that we wanted to know our involvement, and we wanted to have the facts. The change we would make if we were handling this case today, and in fact the way we are dealing with some other cases, is to participate more and to involve ourselves more during discussion. In fact, that is one of the recommendations I made again in my statement. Let's give all parties a

chance. And let's make the settlement opportunity equal to all parties. And let people decide independently.

The one thing I wouldn't change is I wouldn't have accepted, and I still would not accept the Government's $1.23 billion estimate.

Mr. LEVITAS. We are going to get to that, because I don't know that they know how they got to that. And I'll be frank with you, I don't know—and I respect you and Dr. Chu and I don't think anybody knows what's going on down here until we get into it and what is going to be met by cleanup.

Mr. HARNESS. That is why we need the study and we should have proceeded.

Mr. LEVITAS. Ms. Johnson.

Mrs. JOHNSON. I have no questions, Mr. Chairman. But I do want to thank the panel for your participation and for your frankness. I think if there is one thing that has come clear over the last year of these hearings is that this legislation and the problem it addresses has posed many new difficulties both for Government and for the private sector. It is really only through a responsive cooperative effort that we will find the means to address it.

I do thank you for your straightforwardness and urge your continued participation as we address the issue of reauthorizing legislation. I am hopeful that we will take advantage of the best resources and achieve the greatest cooperation from the private sector.

Thank you.

Mr. LEVITAS. Thank you very much, Ms. Johnson.

Let me just run through a few quick questions for each of you. Mr. Harness, at any point did Monsanto propose to provide an alternative water supply for Seymour?

Mr. HARNESS. Yes.

Mr. LEVITAS. And was that offer withdrawn when the lawsuit was amended to name Monsanto as a defendant?

Mr. HARNESS. Withdrawn? A little bit, sir. We still believed that something should be done. We did notify the city of Seymour, the mayor, that the lawsuit did complicate things and we were going to have to see what the lawsuit brought us before we would proceed with that.

Mr. LEVITAS. I view your testimony, by the way—don't attach—I view your testimony as being contrary in a number of particulars to that which I heard earlier today, specifically from Mr. Topol, about the events between—excuse me. [Pause.] And I want to make a note of that, because it does concern me. I also might say that I have asked our staff to contact Dr. Hirschhorn to send him copies of your comments. And I am asking him for a formal response for the record. And you will be afforded the opportunity to examine it if you so desire.

Now, you say that your offer, subsequent in the third stage after November 1982, but all of your offers were rejected and the Government's principal reason for refusal was you could not provide for a guaranteed cleanup. Isn't that a perfectly reasonable position for the Government to take?

Mr. HARNESS. In concept I would agree that it is a reasonable position. I think what we offered them though, was a plan that was sound and would lead to a reasonable cleanup. Our response to

that was always: "Well, give us the standards by which we can define clean, and then we'll design a plan to do that."

For some very good reasons, they aren't able to do that. It is a very difficult, technical problem. So again, it's a chicken and an egg. You can't design a plan to lead to cleanup until you define what clean is.

Mr. LEVITAS. And I think that was the point that Dr. Hirschhorn did make yeaterday.

Mr. HARNESS. Yes. I believe so.

Mr. LEVITAS. And what is—cleaning up is still an open question as I think we've all said. But now, I gather from the testimony this morning and from previous conversations I have had, that the people who participated in the IBM-Topol group are somewhat sensitive when people, myself included, refer to their settlement as a "Sweetheart Deal." Do any of you take strong exception to the use of that term?

Mr. JACKSON. I certainly do not take exception to that. And I am going to pose this question: Why did the Government and the 24 companies, why was there only 10 days notice given of the settlement agreement if it wasn't some kind of a "sweetheart deal"? And why didn't they remove more soil if that is something EPA agreed to. I'm not saying that hard negotiations wouldn't have knocked that out, but at least that is a question.

And some parties have been down there to Judge Steckler and said: "Hey, wait a minute. We want more time to comment on this thing." And if you will all read through your comments that were submitted to the judge, one attorney says: "Well, we got our copy of the Federal Register and that went to our law library and by the time it circulated to my desk, the time period had expired, and I didn't have much chance to comment. But I am going to send this thing in anyway." And that is probably one reason why you don't have more comments than you do.

Mr. LEVITAS. I am sort of surprised that there was not a formal protest at the hearing, quite frankly. In the case of Dr. Atkins, I think his testimony makes a very strong case for what the difference is between a fair, equitable arrangement for all partiularly responsible parties and a "sweetheart deal." And I think, as I understand your statement, your firm has really gotten the short end of the stick.

Dr. ATKINS. I personally feel that the term "sweetheart deal" could be applied to the agreement. But our major concern is why the Department of Justic will not extend that agreement to others. Alcoa offered the same agreement for subsurface as existed for surface. The major exception is not with the group of 24 that had the imagination to develop the deal, but with the Department of Justice who felt that they didn't have the flexibility to be fair and equitable to everyone.

Mr. LEVITAS. Thank you very much, gentlemen. I am going to keep the record open for 2 weeks in the event there are additional matters that should be provided by way of supplementation from yourself and others. And the possibility that we may have questions that we did not think of during the course of today that we might submit to you in writing and request that you respond in writing.

Your testimony has been extremely helpful. Speaking for myself, I've got a much clearer understanding now of what was going on during this period of time. And I think I see some directions in which there should be changes made in the way these matters are handled in the future. Your contribution has been extremely useful. I want to express my appreciation to you.

Mr. MOLINARI. I would like to join in those same remarks.

Mr. LEVITAS. Tomorrow morning the subcommittee will reconvene to hear from Chemical Waste Management. The meeting will be in 2253 Rayburn House Building.

The subcommittee stands in recess until that time.

[Whereupon, at 4:27 p.m., the hearing was adjourned, to reconvene at 10 a.m., Thursday, March 15, 1984.]

[The following was received for the record:]

INTERNATIONAL BUSINESS MACHINES CORP.,
Tarrytown, NY, April 3, 1984

Hon. ELLIOTT H. LEVITAS,
Chairman, Subcommittee on Investigations and Oversight, Committee on Public Works and Transportation, House of Representatives, Washington, DC.

Re Seymour Recycling Hazardous Waste Site

DEAR CHAIRMAN LEVITAS: Enclosed is the corrected transcript containing the testimony of Messrs. Arthur J. Hedge, Jr. and Allan Topol before the Subcommittee on Investigations and Oversight on March 14, 1984, together with a list of the corrections.

At the hearing before the Subcommittee, IBM was asked to submit copies of its consultant's report on possible groundwater problems at the Seymour, Indiana site, and also copies of IBM's Corporate Policy and Corporate Facilities Practice statements relating to the matter of hazardous waste disposal. Copies of those documents accompany this letter and, in accordance with your request, we are indicating where they should be placed in the transcript. The consultant's report should be placed at page 39, line 900 of the transcript; the Corporate Policy and Corporate Facilities Practice statements should be placed at page 77, line 1786 of the transcript.

IBM was also asked whether it had notified the Environmental Protection Agency of the United States Government and other parties of the problems which it had encountered at the Seymour site when IBM decided to discontinue its use of this site. I had indicated at the hearing that I would investigate this matter and respond further subsequent to the hearing. I have not been able to determine whether IBM specifically communicated with the Governmental officials involved in 1977. However, at that time, officials of the State of Indiana were aware of deteriorating conditions at Seymour, and negotiated for a remedy with the site operator. The State Attorney General filed suit for an injunction in April, 1978. This information should be placed at page 72, line 1662 of the transcript.

On behalf of IBM I would like to thank you and the members of the Subcommittee for the courtesies extended during our recent appearance.

Very truly yours,

ARTHUR J. HEDGE, Jr.

HAZARDOUS WASTE CONTAMINATION OF WATER RESOURCES

(Superfund Clean-up Policy and the Seymour Recycling Case)

THURSDAY, MARCH 15, 1984

HOUSE OF REPRESENTATIVES,
SUBCOMMITTEE ON INVESTIGATIONS AND OVERSIGHT,
COMMITTEE ON PUBLIC WORKS AND TRANSPORTATION,
Washington, DC.

The subcommittee met at 10:05 a.m. in room 2253 of the Rayburn House Office Building; Hon. Elliott H. Levitas, chairman of the subcommittee, presiding.

Mr. LEVITAS. The subcommittee will please come to order.

This morning we are continuing our subcommittee's oversight investigation on the subject of hazardous waste contamination of water resources. Much of our review concerns the 1980 Superfund law, and we are looking specifically with reference to the Seymour Recycling Hazardous Waste Site in Seymour, IN. We believe that particular site, and the settlement that was related to it, probably reveals a great deal about the Superfund Program, hazardous waste and hazardous contamination, and what is being done, perhaps more than any other single example than we have been able to find. And we are attempting to review this site all the way from the commencement of the recycling plant in Seymour, IN down through and including the beginning phases of the cleanup that is now in process.

This morning we are completing the third of three hearings this week, and we'll be hearing today from Chemical Waste Management, Inc., which is engaged in the surface removal of the materials, hazardous materials, at the Seymour site. After this week's hearings, we expect to schedule additional hearings with former EPA and Justice Department officials as well as with present Justice Department and EPA officials.

Chemical Waste Management is being represented today by Mr. Jeffrey Diver who is vice president and general counsel of that company from Oak Brook, IL. And before I administer the oath, I see you are accompanied by Mr. Bock, as well. And I'll let you introduce Mr. Bock when you get into your testimony.

Before I begin, I would like to inquire whether my colleague, the gentleman from New York, has anything to say in opening.

Mr. MOLINARI. No. I don't, Mr. Chairman. I'm looking forward to the testimony, but I have no prepared statement.

Mr. LEVITAS. Thank you very much.

That being the case, I think we ought to get right into it. As I indicated there may be some very serious scheduling problems during the day today because of matters that are occurring in the House of Representatives. We will do the best we can and try to move forward as expeditiously as possible.

[Witnesses sworn.]

Mr. LEVITAS. Thank you very much, gentlemen. Mr. Diver, you may proceed, and I would request that you, as part of your opening comments, introduce Mr. Bock and also identify yourself by title.

TESTIMONY OF JEFFREY DIVER, VICE PRESIDENT AND GENERAL COUNSEL, CHEMICAL WASTE MANAGEMENT, INC., ACCOMPANIED BY RAYMOND W. BOCK, DIRECTOR OF PROJECT DEVELOPMENT, ENVIRONMENTAL REMEDIAL ACTION DIVISION, CHEMICAL WASTE MANAGEMENT, INC.

Mr. DIVER. Good morning. Thank you, Mr. Chairman. As you have indicated, my name is Jeffrey Diver. I am——

Mr. LEVITAS. Is it "Diver"?

Mr. DIVER. It's Diver. It's an Irish name, as matters would have it, Mr. Chairman.

I currently serve as the vice president and general counsel of Chemical Waste Management, Inc. I am appearing today to discuss my company's role in the Superfund cleanup effort. I have with me Mr. Raymond Bock, B-o-c-k, who is the director of project development for Enrac, E-n-r-a-c, which stands for Environmental Remedial Action which is a division of Chemical Waste Management, Inc., devoted to cleanup projects involving Superfund or voluntary cleanup projects.

Chemical Waste Management is a subsidiary of Waste Management, Inc. of Oak Brook, IL. Waste Management is the largest firm dedicated to the collection, treatment and disposal of municipal and industrial wastes on a worldwide basis.

We have been specifically asked to address the practical aspects of cleaning up abandoned hazardous waste sites. Our recent experience with the Seymour Recycling Center, in Seymour, IN, is our principal case in point today.

The prompt surface cleanup of this sizable site could only have been accomplished with the construction cooperation of both the private enterprises and public agencies involved. We are eager to share with you our experiences and the lessons we learned as the contractor for the voluntary cleanup effort.

Chemical Waste Management first became involved with the Seymour Recycling Center in April of 1980. Representatves of IBM and Cummins Engine Co., contracted with CWM to remove approximately 2,000 drums of waste materials from the Seymour site. That project was accomplished at about that point in time.

Chemical Waste Management's second contact with the Seymour site came almost 2 years later, in January 1982 when representatives of IBM advised us that a group of generators was considering funding a voluntary cleanup at Seymour. Chemical Waste Management, and two other companies were invited to present estimates for a surface cleanup to this generator group. My company's gener-

al estimate was $9.5 million—actually I believe it was $9.8 million—which was, as we understood it, the lowest of the three submitted.

Following this submission, we were informed that the group originally proposing a voluntary cleanup had been disbanded. But, in late July or early August 1982, Chemical Waste was again approached by IBM and advised that a new and smaller group of generators had been formed in order to complete a voluntary surface cleanup. We were asked to work with this group and to perform a surface cleanup on their behalf.

Our selection was based on our previous low bid, our good business experience with many of the generators in this new group, and the fact that Chemical Waste Management, and its affiliates, possessed their own permitted sites and facilities capable of disposing of Seymour waste.

Upon our selection as contractor, Chemical Waste Management prepared a second, more extensive technical proposal for the surface cleanup. Between August to October 26, 1982, we met at various times with the generator group, the Environmental Protection Agency, and the Department of Justice to work out the technical requirements for the Seymour cleanup. After field investigations at the site, our company's Environmental Remedial Action Division developed a program to identify, collect, package, transport, treat, and dispose of several thousand drums, miscellaneous chemicals, tanks, surface debris and soil located at the site.

This work plan is incorporated in exhibit B of the final consent decree submitted to the Federal district court for the Southern district of Indiana on October 26, 1982, and signed by the court on December 8, 1982.

Enrac began surface cleanup at Seymour in December, 1982, and the work was completed some 13 months later on January 19, 1984. While the original consent decree envisioned a 50 week schedule for completion, the soil excavation phase of the work was delayed by 20 inches of rainfall in October and November of 1983, which inhibited earth-moving operations and impeded our efforts to implace clay soil. An extension of the original 50-week schedule was granted by the Federal court, and January 24, 1984, was set as the new completion date. We came in 5 days early.

While our original estimate for the cost of the project was $9.8 million, we received $7,644,000 under the consent decree. We were also required to secure a $15 million completion bond. As further insurance that the cleanup would conform to the consent decree, Chemical Waste Management signed the consent agreement independently and became, thereby, an official party to the agreement.

The involvement of Chemical Waste Management in the Seymour cleanup was complicated by the inclusion in the generator group of a company called Waste Resources of Tennessee, Inc., which was a subsidiary of a subsidiary of a subsidiary of a company acquired by Waste Management, Inc., Chemical Waste's parent corporation, on February 27, 1981.

In a multimillion-dollar transaction, Waste Management acquired EMW Ventures, Inc., and its subsidiary, Warner Co., which includes Waste Resources Corp., of which Waste Resources of Tennessee is a very small part. Let me just digress from my typewrit-

ten statement to indicate that at the point in time, Waste Resources in terms of its ability as a national company involved in waste storage, transportation, treatment and disposal, represented about the fourth largest company in the United States.

At some time prior to Waste Management, Inc.'s, acquisition of EMW Ventures, Waste Resources of Tennessee apparently shipped several drums to the Seymour Recycling Center. According to later EPA estimates, the total waste shipped from Waste Resources of Tennessee to Seymour was less than one-tenth of 1 percent of the total waste found on the site. On May 14, 1982, potential responsible party correspondence was mailed to Waste Resources of Tennessee by the Department of Justice. Let the record show the correction in my statement.

But Chemical Waste Management did not know of its connection with Waste Resources of Tennessee as a potential responsible party at Seymour until well after our submission of estimates and technical proposals to the generator group and the EPA.

Upon learning of the connection, we decided to include Waste Resources of Tennessee, as a partner in the final group of generators for surface cleanup at the Seymour site.

This decision was based on two principal factors: First, Chemical Waste Management was initially unsure of the extent of Waste Resources' liability at the Seymour site. Not until after the consent decree was submitted to the court did we discover that the share of the cleanup allocated by EPA to Waste Resources was $18,946. We were informed of this fact in correspondence received from, again, the Department of Justice on or about November 1, 1982.

Second, several of the generators, upon learning of Chemical Waste Management's connection with Waste Resources of Tennessee, felt that the legal position of Chemical Waste, as the contractor, would be improved by the inclusion of Waste Resources as a party to the consent decree. We tended to agree.

Speculation has since arisen that Chemical Waste Management joined the voluntary cleanup group solely to gain an exemption from further groundwater or subsurface cleanup liablity. But at the time that Waste Resources of Tennessee joined the other generators in the cleanup effort, neither Chemical Waste Management nor any of the generators were aware of the final decision by EPA and the Justice Department to provide a total exemption from further liability.

Until very late in the negotiations between the generators and Government agencies, it was even unclear whether the final negotiated document would be in the form of a consent decreee or a covenant not to sue, or whether it would include any exemption from further liability.

Following the issuance of the consent decree, a meeting was held among representatives of the parties to the decree: several generators, EPA region V officers, the Department of Justice and Chemical Waste Management. The meeting was Chaired by Stephen Ramsey, Chief of the Environmental Enforcement Section of the Justice Department's Land and Natural Resources Division. The meeting concentrated on four major issues raised by the Justice Department, involving Chemical Waste Management's cleanup operation.

For the committee's benefit, I will summarize the background and resolution of these four issues: First, the subject of monthly reports. Chemical Waste Management was required to provide the Federal court, the Department of Justice, and the State of Indiana with a written status report on the progress and the completion of the cleanup every 30 days until the work was completed. The Department of Justice advised us at the March 7 meeting that since the cleanup had begun in late December of 1982, two monthly reports were past due. The two delinquent reports were filed 3 days later, and Chemical Waste Management never again filed a late report during the remaining 11 months of the project.

Issue No. 2: Chemical Waste Management truck accident. On January 25, 1983, a Chemical Waste Management truck removing crushed barrels and debris from the Seymour site was involved in a single-vehicle accident. A power takeoff on the truck was accidentally engaged while the truck was in transit, causing the body of the vehicle to raise and strike an overpass. According to the official accident report, three drums and approximately one-half cubic yard of debris were spilled onto the pavement.

The first official on the scene was an officer from the county sheriff's department who called the Indiana State Emergency Response Team with a request for assistance. The officer also notified the Indiana Stream Pollution Control Board of the incident. The Indiana Emergency Response Team and a chemical waste management crew quickly cleaned up the accident scene, and my company dispatched one of our managers to inspect the site and document its thorough restoration.

Chemical Waste Management was subsequently assessed a $250 penalty by the Indiana Stream Pollution Control Board for failing to notify the board of the accident. While we believe there was no reason to contact the stream pollution board since the sheriff's deputy had already done so and since the spill was not in or near any waterway, we nevertheless determined not to contest the penalty because of the de minimus amount being assessed.

Having failed in this instance to cover the cargo area of one of our trucks with a protective tarpaulin, Chemical Waste Management promptly assured the Department of Justice that in the future all our trucks would be tarped and that other transportation procedures required by the work plan would be strictly adhered to.

The third issue discussed on our study concerned the shipment of Seymour wastes to other facilities. As noted by the Department of Justice, some Seymour waste materials were shipped between January and March 1983 to a site affiliated with Chemical Waste Management but not listed in the work plan. This site was the Evergreen Landfill, located in Northwood, OH. As we stated at the March 7 meeting and in a March 29 letter to the Department of Justice, the list of facilities included in the work plan should have been construed as illustrative and not all inclusive. Nevertheless, Chemical Waste Management immediately ended its shipments to nonspecified facilities. Fifty-two such shipments were made to the Evergreen facility before we ceased those shipments in March 1983.

We subsequently requested an amendment to the consent decree to permit the disposal of certain Seymour waste as the Evergreen

landfill, and this amendment was approved by the Department of Justice.

The fourth issue concerned drum-crushing operations. As to this issue, I am submitting as an appendix to this testimony our letter of March 21, 1983, to the regional counsel of the EPA's region V. This letter offers a thorough explanation of the variance from work plan specifications in the construction of a drum-crushing pad, our proposed modification of the work plan specifications, and EPA's approval of this modification.

[Information received from Mr. Diver follows:]

March 21, 1983

Robert Schaefer
Regional Counsel
United States Environmental
Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

RE: Drum Crushing Pad
Seymour Recycling Center-
Clean Up
Chemical Waste
Management, Inc.
Seymour, In.

Dear Mr. Schaefer,

In accordance with discussions at the March 18 weekly meeting, presented herein are details on the drum crushing pad. With regard to the variances in the construction of the drum crushing pad, we have investigated its initial construction and have determined that it varies from the technical proposal in four ways; the dimension, the addition of a protective layer underneath the bottom liner, its anchoring into only one berm, and the use of #53 crushed stone.

Our reasons for initially constructing the pad with these variances are as follows:

The dimension was originally proposed at 90 feet by 90 feet. Due to the proximity of an existing structure on the east, a fire hydrant on the north, and the area required for access on the west, it was necessary to change the dimensions to 100 feet by 70 feet.

When preparing the subgrade on which to lay the polyethylene liner, a decision was made to lay down a 6 inch protective sand layer. The protective blanket was to ensure the liner would not be punctured.

As designed and constructed the pad has a berm on four sides, although only the berm on the south side is visible above the crushed stone drainage layer. As the pad was constructed to drain to the south, liners on the south side were anchored so that the larger berm could provide additional containment for the drum crushing operation. On the remaining three sides, the liner was laid on top of the berms.

Crushed stone #53 was used rather than the 2 inch limestone. This was due to it being more readily available.

In order to alleviate all concerns over the drum crushing pad, Chemical Waste Management, Inc. proposes the addition of another liner, anchored on four sides with a sump on the south end. This detail is provided in the attachment. As shown, the pad will provide for containment of approximately 10,950 cubic feet, or 81,900 gallons. This is an increase in current capacity, and far in excess of any rainfall which one would expect in a 24 hour period. The primary containment will be provided on the south side in a trench approximating 100 feet by 3 feet by 3 feet. As shown, a collection pipe will be installed to provide easy access for the removal of wastes. At the end of each day, accumulated materials will be vacuumed and handled as a hazardous waste for purposes of analytical work and disposal off-site.

Anchoring on the east side will be performed by the installation of wooden timbers, such as railroad ties or telephone poles. In this manner, trucks which are staged for loading will not disturb the eastern containment features. On the north side, there currently exists an approximate elevation difference of 1.5 feet. This will increase by the installation of another liner and a stone drainage blanket to an approximate 3 foot elevation differential. This eliminates any possibility for surface water run on from the north.

On the west, a berm will be constructed for purposes of containment. The access ramp will be constructed of stone to provide greater stability for the heavy equipment.

The materials will be installed over the existing pad, once it has been cleared of excess waste material. After grading to achieve a 3 percent slope, a geotextile material will be laid down in order to protect the synthetic liner. A 60 mil high density polyethylene liner will be installed on top of the geotextile, which in turn will be overlain by another protective geotextile membrane. A crushed stone layer on the order of 4 to 6 inches will then be installed, followed by one foot of riprap.

In addition to the new construction work on the drum crushing pad, upon completion of the surface work and removal of all drums, Chemical Waste Management, Inc. will undertake a more comprehensive analytical and soil removal plan for the immediate drum crushing area than is specified in the Technical Proposal. Under this plan, following removal of the drum crushing pad itself, we will institute a soil sampling program wherein the area that was directly beneath the drum crushing pad will be sampled to a depth of two feet as opposed to one foot in the original plan.

The samples will be taken on a grid basis every ten feet starting at the outer edge of the crushing area and covering

the entire area of the pad. Following analysis of the samples, a full two feet of soil will be removed (as opposed to one in the original plan) and two feet of clean soil will be redeposited. We feel that this additional level of work combined with the extra construction work on the existing crushing pad will sufficiently document the integrity of the drum crushing operations throughout the duration of the project.

As soon as this modification is approved, a well qualified liner installation company will be asked to begin work. From date of the approved change, it is anticipated the revisions can be made within no more than two weeks.

Please do not hesitate to call if you have any questions.

Sincerely,

Raymond Bock
Program Director
Superfund Activities

JCL/lr

Attachment

cc: Cummin's Engine Co., Inc.
General Motors
IBM
Merchants National Bank & Trust
State of Indiana - Office of Attorney General
Chief, Environmental Enforcement Section
U.S. Department of Justice
Region V - Remedial Response Branch
State of Indiana - Board of Health
Division of Land Pollution Control
Jackson County Health Dept.

DISTRIBUTION LIST

Cummins Engine Co., Inc.
P.O. Box 3005
Columbus, Indiana 47201
Attn: J. Uranga, Legal Dept.

General Motors
Env. Activities Staff Bldg.
GM Tech Center
Warren, Michigan 48090
Attn: J. Chu

IBM
540 White Plains Rd.
Tarrytown, New York 10591
Attn: R. Morris, Jr.

Merchants National Bank & Trust
One Merchants Plaza
Indianapolis, Indiana 46255
Attn: M. Hunter

State of Indiana
Office of the Attorney General
100 N. Senate
Indianapolis, In. 46204
Attn: Linley E. Pearson

Office of Regional Counsel
Region V
United States Environmental Protection Agency
230 South Dearborn St.
Chicago, Illinois 60604

Chief, Environmental Enforcement Section
U.S. Department of Justice
Land and Natural Resources Division
Ninth and Pennsylvania Ave. NW
Washington, D.C. 20530

Remedial Response Branch
Region V
United States Environmental Protection Agency
230 South Dearborn St.
Chicago, Illinois 60604
Attn: B. Kush

State of Indiana
State Board of Health
Division of Land Pollution Control
1330 W. Michigan St.
Indianapolis, In. 46206
Attn: Jim Knoy

Jackson County Health Dept.
%Jackson County Hospital
Seymour, In. 47274
Attn: Ken Kavanaugh

In addition to remedying all the performance deficiencies cited by the Justice Department, Chemical Waste Management independently added on-site management personnel to monitor compliance with the work plan. We implemented internal audit procedures to assure full compliance with the consent decree. A contract administrator was assigned to the site at all times. And an engineer from our corporate environmental management department was sent to the site to monitor sampling, analysis and disposal activities. And an independent consulting firm was hired to review overall procedures and systems to insure compliance with both the work plan and the consent decree for cleaning up the Seymour site.

In conclusion, Mr. Chairman, we believe Chemical Waste Management's experience at the Seymour site was a successful one. We are frank to acknowledge that mistakes were made, but we are proud to report, as well, that the mistakes, once discovered, were quickly corrected and controls improved.

For the committee's convenience and review, we are submitting today copies of the consent decree, our detailed work plan and all of the monthly reports we submitted to the court.

[Information received from Mr. Topol follows:]

DEC 13 1982

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N. W.
P. O. BOX 7566
WASHINGTON, D. C. 20044

(202) 662-6000
WRITER'S DIRECT DIAL NUMBER

(202) 662-5402

DANIEL M. GIBSON
STANLEY L. TEMKO
DON L. HARRIS, JR.
WILLIAM STANLEY, JR.
CRAVER W. DURHAM
ERWIN N. GRISWOLD
JEROME ACKERMAN
HENRY B. MAILER
JOHN H. SCHAFER
ALFRED M. HOBBS
JOHN LAMOTHE SCOTT
DAVID E. MORIPERI
H. EDWARD DUMMELDOOER, JR.
BRICE MEADOC CLAGETT
RICHARD D. BRADT
ROBERT E. O'MALLEY
EUGENE I. LAMBERT
HARRIS A. WEISS
HARRIS WEINSTEIN
JOHN B. GERRITSON
PETER J. NICKLES
JONATHAN G. BLACK
CHARLES E. RUTTER
ROBERT N. SAY, JR.
C. EDWARD BRUCE
DAVID N. BROWN
PAUL J. TAGLIABUE
ANDREW W. SINGER
DAVID H. MICHAELS
RUSSELL M. CARPENTER, JR.
NICHOLAS W. FELL
THEODORE R. GARRETT
DANE I. ACKERLY
JOHN W. VINE
JOHN THOMAS SMITH II
JOHN P. BURY
CHAUNCEY FT. JR.
RICHARD F. KINGHAM
ROBERT M. SUSSMAN
MICHAEL B. SIEGEL
GEORGE A. REID, JR.
THOMAS C. WILLIAMSON, JR.

HARRY L. SHNIDERMAN
EDWIN B. COHEN
JAMES C. MCKAY
JOHN M. DOUGLAS
HAMILTON CAROTHERS
A. RANDOLPH WILSON
ROBERT B. OWEN
EDGAR F. CZARRA, JR.
WILLIAM M. ALLEN
DAVID B. ISBELL
JOHN B. JONES, JR.
PAUL R. DIX, JR.
PHILIP D. STANDSBURY
CHARLES A. MILLER
PETER GORTON HUTT
HERBERT STOLL
JOHN VANDERSTAR
NEWMAN T. HALVORSON, JR.
HARVEY M. APPLEBAUM
MICHAEL B. HORNE
CHARLES F. C. RUFF
MICHAEL BOUDIN
BINGHAM L. AVERICH
ALLAN TOPOL
VIRGINIA D. MATHIN
RICHARD B. COOPAKEN
CHARLES LIEFER
PETER D. TROCCHIO
ROBERT B. WILLIAMS, JR.
DONALD G. BLAZES
WILLIAM D. IVERSON
E. WILLIAM LIVINGSTON, JR.
JAMES R. ATWOOD
COLEMAN S. HICKS
STUART C. STOCK
EUGENE D. GULLAND
O. THOMAS JOHNSON, JR.
EUGENE A. LUDWIG
PATRICIA A. BARALD
THEODORE C. WESTBROOK
THEODORE VOGEL, JR.
JEFFREY S. HUVELLE

H. THOMAS AUSTERN
FONTAINE C. BRADLEY
EDWARD BURLING, JR.
HOWARD C. WESTWOOD
CHARLES A. HOBBAT
JOHN T. BARENDA
H. CROSBY ROPER, JR.
JAMES H. MCCLOTHLIN
ERNEST W. JENNES
COUNSEL
JOHN SHERMAN COOPER
OF COUNSEL

TWX 710 822-0009 CB WSH
TELEX 89-822 COVLING WSH
TELECOPIER (202) 662-6291
CABLE COVLING

December 10, 1982

To: All Companies Who Signed the Proposed Consent Decree in the Seymour Matter

Ladies and Gentlemen:

Enclosed for your files is a copy of the Consent Decree as executed and entered by Judge Steckler. Please call me if you have any questions.

Very truly yours,

Allan Topol

Enclosure

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA

FILED
Oct 26 12 26 PM '82

UNITED STATES OF AMERICA,

Plaintiff,

v.

SEYMOUR RECYCLING CORPORATION;
ENVIRONMENTAL PROCESSING CORPORATION;
SEYMOUR MANUFACTURING CO., INC.;
CHEM-DYNE CORPORATION;
K.O.I. PETROLEUM COMPANY, INC.;
TRANSENVIRONMENTAL CORPORATION;
CITY OF SEYMOUR, INDIANA;
BOARD OF AVIATION COMMISSIONERS, Seymour, Indiana;
WILLIAM L. KOVACS;
BRUCE WHITTEN;
WILLIAM VANCE, in his capacity as receiver of Seymour Recycling Corporation;
JACK ZETTLER, in his capacity as receiver of Chem-Dyne Corporation, K.O.I. Petroleum Company, Inc., Transenvironmental Corporation;
INTERNATIONAL BUSINESS MACHINES CORPORATION;
GENERAL MOTORS CORPORATION;
E.I. du PONT de NEMOURS & COMPANY, INC.;
GENERAL ELECTRIC COMPANY;
PENNWALT CORPORATION;
WESTERN ELECTRIC COMPANY;
UNITED TECHNOLOGIES CORPORATION;
ATLANTIC RICHFIELD COMPANY;
BORG-WARNER CHEMICALS, INC.;
RCA CORPORATION;
BEMIS COMPANY, INC.;
FORD MOTOR COMPANY;
WHIRLPOOL CORPORATION;
MCDONNELL DOUGLAS CORPORATION;
DOW CORNING CORPORATION;
OWENS-ILLINOIS, INC.;
THE PROCTOR & GAMBLE COMPANY;
GENERAL AMERICAN TRANSPORTATION CORPORATION;
AMERICAN CAN COMPANY;
OLIN CORPORATION

Civil Action No.
IP-80-457-C

AM GENERAL CORPORATION;
CUMMINS ENGINE COMPANY, INC.;
NCR, CORP.;
WASTE RESOURCES OF TENNESSEE, INC.
(an affiliate of Chemical Waste
Management, Inc.)

Defendants.

CONSENT DECREE

WHEREAS, the United States of America ("United States") filed a complaint in this case on May 9, 1980, under Section 7003 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6973, and Section 311 of the Clean Water Act ("CWA"), 33 U.S.C. § 1321, alleging, inter alia, the existence of an imminent and substantial endangerment to human health, welfare and the environment due to the handling, treatment, storage, transportation, disposal and presence of solid and hazardous wastes and other pollutants and contaminants ("Materials") at Freeman Field Industrial Park near Seymour, Indiana ("Seymour site"); and

WHEREAS, the United States filed an amended complaint on the 26th day of October, 1982, under Sections 106 and 107 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA"), 42 U.S.C. 9606, 9607, alleging, inter alia, that as responsible parties under CERCLA, those companies listed in Exhibit A hereto (hereinafter the "Companies") have created or contributed to the existence of an imminent and substantial endangerment to public health, welfare or the environment at the Seymour site and are thus

liable for abatement of the endangerment and for costs expended by the United States to abate the endangerment at the Seymour site; and

WHEREAS, the Companies deny responsibility for the disposal of materials at the Seymour site and deny any legal or equitable liability under any statute, regulation, ordinance or common law for any response costs or damages caused by storage, treatment, handling or disposal activities or actual or threatened release of materials at the Seymour site or by materials, if any, disposed of by the Companies to, through or at the direction of Seymour Recycling Corporation or any of the defendants in Civil Action No. IP-80-457-C; and

WHEREAS, (1) the United States, (2) the State of Indiana ("State"), and (3) the County of Jackson, Indiana, the City of Seymour, Indiana and the Board of Aviation Commissioners of the City of Seymour, Indiana (the latter three entities hereinafter the "local governments") desire to covenant not to sue, not to issue administrative orders or to execute judgment against the Companies for civil matters arising out of the transportation, storage, treatment, handling, disposal or presence of materials by the Companies at the Seymour site but not in such a way as to impair any claim which the United States or State may have against any other person or entity than the Companies; and

WHEREAS, it is not the intention of the United States or the State by entering into this Consent Decree to settle any

claim, or to covenant not to sue or issue administrative orders or not to execute judgment against any other persons or entities other than the Companies for liability arising under any statute or common law with respect to the transportation, storage, treatment, handling, disposal or presence of materials at the Seymour site; and

WHEREAS, it is the intention of the United States or the State to seek additional relief from persons or entities other than the Companies for costs incurred by the United States or the State and for injunctive or other relief to which the United States or the State may be entitled at law or equity arising out of and resulting from the transportation, storage, treatment, handling, disposal or presence of materials at the Seymour site to enable the United States and the State to recover the full relief available to them at law or equity from all parties who may be liable for cost recovery and injunctive or other relief at the Seymour site; and

WHEREAS, the parties recognize and intend to further hereby the public interest in avoiding prolonged and complicated litigation between the parties and to expedite the abatement of a portion of the imminent and substantial endangerment which is alleged to or may be presented at the Seymour site; and

WHEREAS, each undersigned representative of the parties to this Consent Decree certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Decree and to execute and to legally bind such party to this document.

Therefore, It is Ordered, Adjudged and Decreed:

I.

This Court has jurisdiction of this matter and of the parties consenting thereto.

II.

This Decree applies to and is binding upon the undersigned parties and their successors and assigns. The sole obligations and responsibilities of the Companies, other than Chemical Waste Management, Inc. (hereinafter "CWM"), under this Decree are set forth in Paragraphs III, XI, XIV, XV and XVII herein, and such Companies shall not have any further obligations or responsibilities with respect to the Seymour site other than those under the aforesaid provisions of this Decree. The obligations of CWM under this Decree are set forth in Paragraphs III-XI, XIV, XV and XVII.

III.

Within fifteen (15) days after the entry of this Decree, the Companies each shall pay to the Seymour Site Trust Fund (hereinafter the "Trust Fund") established at the Merchants National Bank & Trust Company in Indianapolis, Indiana the sum which is shown for that Company in Exhibit A hereto, which payment is not a penalty. One or more of the Companies listed in Exhibit A hereto shall serve as Trustees of the Trust Fund.

IV.

The Trustees shall use the money in the Trust Fund to pay CWM to perform the Work described in Exhibit B hereto (hereinafter referred to as the "Work"), which Exhibit is hereby incorporated by reference and made a part of this Consent Decree as though it were set forth verbatim. CWM shall be responsible for completion of the Work; and, CWM agrees to assume, and does assume, any and all liability arising out of its acts or omissions in the performance of the Work or its failure to satisfactorily and fully perform and complete the Work as defined in Exhibit B hereto. CWM shall purchase a performance bond in the amount of $15 million dollars, which bond shall assure complete performance of the Work. In event of default the bond shall provide that the Work shall be satisfactorily and fully completed and in no event shall the bond authorize the surety to avoid its obligations to have the work fully completed. CWM shall purchase and maintain in force insurance policies which shall fully protect the United States, the State and the public against any and all liability arising out of its acts or omissions in the performance of the Work. The insurance policies and the performance bond shall contain coverage of the type and in the amounts shown in Exhibits C and D hereto, which coverage has been approved by the United States and the State.

V.

Subject to obtaining the appropriate federal, state and local permits, CWM shall commence the Work not later than the 30th (thirtieth) day after entry of this Decree and CWM shall undertake and complete the Work expeditiously in accordance with the standards, specifications and the schedule of completion set forth in Exhibit B.

VI.

No variance shall occur in performance of the Work from the standards, specifications, or schedule of completion contained in Exhibit B without prior written approval by the United States after written notification by CWM to the United States, the State and the Trustees of the nature of and reason for any such requested variance. CWM shall be responsible for obtaining all federal, state or local permits and complying with all applicable federal, state or local laws governing the performance of the Work, including the transportation and disposal of the Materials. CWM shall provide the Court, the United States and the State with a written status report on the progress and completion of the Work every 30 days until the Work is completed.

VII.

CWM shall be liable for stipulated penalties in the amount of $1,000 (one thousand dollars) for each day on which it fails to complete the performance of the Work in accordance

with Exhibit B. Any failure of CWM to complete the Work which results from circumstances beyond the control of CWM shall not be deemed to be a violation of its obligation and shall not make CWM liable for the stipulated penalties. To the extent delay is caused by such circumstances, the time for performance hereunder shall be extended.

, CWM shall immediately notify the United States, the State and the Trustees of any delay which occurs in the performance of the Work. Such notification shall be in writing and shall fully describe the nature of the delay, the reasons therefor, the expected duration of the delay, the actions which will be taken by CWM to mitigate further delay and whether the delay may in the opinion of CWM cause or contribute to an endangerment to public health, welfare or the environment. If CWM fails to provide the notice required by this paragraph to the United States it may not receive any extension of time under this decree.

In the event CWM and the United States and the State cannot agree that the time for performance shall be extended, CWM must submit the question to the Court for resolution within a reasonable time or waive its right to receive any such extension. Increased costs or expenses in connection with the performance of the Work shall not constitute a circumstance beyond CWM's control.

VIII.

The United States, the State and their authorized representatives shall have access to the Seymour site at all times until such time as the Work is completed. The United States Environmental Protection Agency (EPA) may designate an on scene coordinator (osc) to observe and monitor the progress of the Work. The osc shall have the authority vested by 40 C.F.R. 300 et seq.; 47 Fed. Reg. 31180 July 16, 1982, including authority to require CWM to cease performance of the Work, any portion thereof, or any other activity at the Seymour site which in the opinion of the osc, may or does present or contribute to an endangerment to public health, welfare or the environment or cause or threaten the release of Materials from the site. In the event the osc does require such cessation of work, the osc then shall have the authority to require CWM to perform the Work consistent with Exhibit B in accordance with the instructions of the osc to avoid or mitigate the endangerment which he believes may occur. If CWM objects to any order requiring cessation of the Work or to any order to perform the Work in accordance with the instructions of the osc, it may petition to the Court to stay or set aside the order of the osc. With respect to the subject matter of this paragraph EPA retains all rights under applicable statute or regulations.

IX.

Until such time as the Work is completed, the United States and the State or their representatives (including the

osc) shall have access to the site for the sampling of wastes at the site and to conduct investigations relating to soil and groundwater contamination beneath or near the Seymour site. In conducting such activities the United States or the State or their representatives shall avoid interference with CWM's performance of the Work. CWM agrees to cooperate with the United States and the State by promptly making available to them all information obtained during the performance of the Work by CWM including information relating to the source and identification of Materials removed from the Seymour site. CWM also agrees to preserve all records related to the Seymour site cleanup, including sampling analysis, chain of custody records, manifests, trucking logs, receipts, reports, traffic routing, destination of Materials, correspondence or other documents produced during the Work at the Seymour site and agrees further that it shall make available such documents, along with access to employees with knowledge of relevant facts concerning the performance of the Work for purposes of investigation, information gathering or testimony related to the Work and Materials found at the Seymour site.

CWM agrees to cooperate with representatives of the United States and the State to permit such representatives to take samples including split samples at all locations whether samples are taken at such locations by CWM or not. Sampling and analysis shall be done by all parties pursuant to EPA protocols. Arrangements for such samples shall be made by the osc.

CWM agrees that samples taken shall be handled according to accepted chain of custody procedures established by the National Enforcement Investigation Center to be provided to CWM by the United States. Before disposal of any samples by CWM, the EPA shall be given thirty days notice and opportunity to take possession of these samples.

X.

CWM shall notify the United States and the State in writing upon the completion of the Work. The Work shall be deemed to be completed when pursuant to the scope of Work in Exhibit B, all materials have been disposed of or treated in accordance with all federal, state and local laws and regulations. Nothing in this decree shall release CWM from liability arising out of or relating to the transportation, treatment, handling, disposal, storage, or releases or threatened releases of Materials at, to, from or near the Seymour site resulting from its performance of the Work. The United States and the State shall review the Work and indicate their agreement or disagreement as to its satisfactory completion within thirty (30) days of receipt of the notification. If neither the United States nor the State advises CWM in writing of any disagreement concerning the completeness of the Work performed within such thirty (30) day period, it shall be deemed that such Work has been completed in full compliance with this decree and the United States and the State shall send a letter to CWM confirming in writing that the Work has been completed.

If the United States or the State believes that the Work has not been completed in accordance with the standards and specifications set out in Exhibit B, they shall notify CWM in writing of what they believe should be done to complete the Work making reference to specific portions of Exhibit B attached hereto and proposing a schedule for completion. If CWM does not object to the corrective measures proposed by the United States or the State within thirty (30) days thereafter, CWM shall expeditiously undertake and complete such measures in accordance with the proposed schedules of completion. If CWM objects to such proposed corrective measures, CWM shall notify the United States and the State within 30 days thereafter of its objections and the reasons therefor. In the event the parties cannot resolve any dispute over whether the Work has been successfully and fully completed, CWM shall submit such dispute to the Court for resolution within 30 days. Failure of CWM to submit such a dispute to the Court shall mean that CWM waives its objections and CWM shall expeditiously undertake and complete the proposed corrective measures in accordance with the schedule of completion.

XI.

The Companies agree that they will each preserve, pending further court order, all records and documents in their possession or the possession of any of their divisions, employees, agents, accountants or attorneys, which relate to any transactions or business with,

or relate in any other way to Seymour Recycling Corporation or associated parties or the Seymour site, despite any document retention policy to the contrary. The term "associated parties" shall be defined as Seymour Manufacturing Company, Chem-Dyne Corporation, Spray-Dyne Corporation, Transenvironmental Corporation, K.O.I. Petroleum Company, Inc., Bruce A. Whitten, and William L. Kovacs. Notwithstanding any other provision of this decree, the United States retains whatever rights it may have under applicable statutes and regulations, governing the collection of records and documents, which is the subject matter of this paragraph, and the Companies retain whatever rights they may have to object to any requests for records and documents.

XII.

To avoid litigation between the parties hereto and the expense that would be incurred in connection with such litigation, and to set to rest forever the differences existing among them, without impairing or affecting the claims of the United States, the State and the local governments against any other person or entity in connection with the Seymour site, the United States, the State and the local governments do hereby covenant not to sue, execute judgment or take any civil judicial or administrative action under common law (federal or state), State and municipal law including ordinances of Jackson County, the City of Seymour or the Seymour Aviation Board, and the following federal statutes: Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 et

seq. (CERCLA); Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA); Clean Water Act, 33 U.S.C. § 1251 et seq. (CWA); The Clean Air Act, 42 U.S.C. 7401 et seq. (CAA); Toxic Substances Control Act, 15 U.S.C. 2601 et seq. (TSCA); Safe Drinking Water Act, 42 U.S.C. 300f. et seq. (SDWA); Federal Insecticide, Fungicide and Rodenticide Act, 7 U.S.C. 136 et seq. (FIFRA); the Refuse Act 33 U.S.C. 407, and any statutes administered or enforced by EPA, against the Companies, their subsidiaries, divisions, parents, affiliates or their respective directors, officers, employees, agents, successors and assigns, arising out of or related to the storage, treatment, handling, disposal, transportation or presence or actual or threatened release or discharge of any materials at, to, from or near the Seymour site, including any action with respect to surface cleanup and soil or groundwater cleanup at the Seymour site. This covenant not to sue, execute judgment or take other action includes all civil legal and administrative costs incurred by the United States, the State and the local governments with respect to matters which are the subject of this consent decree.

It is expressly understood that the United States, the State and the local governments covenant not to sue, execute judgment, or take any civil, judicial or administrative action against the Companies under common law (federal or state), or federal law, state law or municipal law including ordinances of Jackson County, the City of Seymour and the Seymour Aviation Board for causes of action relating to injury to, destruction

of or loss of natural resources of the United States, within the meaning of CERCLA, 42 U.S.C. § 9601 et seq., under the jurisdiction of the United States Department of Interior, arising out of or related to the storage, treatment, handling, disposal, transportation, presence, or actual or threatened release or discharge of any materials at, to, or from or near the Seymour site.

The matters which are the subject of this covenant not to sue or execute judgment contained in this decree are referred to hereafter as "Covered Matters."

Nothing herein shall be construed to release CWM from any continuing liability at law for its failure to perform the Work in accordance with Exhibit B.

To the extent that the law of the State of Indiana may be determined to control and govern the interpretation of this Consent Decree, the parties do not intend that this paragraph shall be a general, unqualified release as that term is defined by Indiana law. The parties intend that this paragraph shall be construed to be a covenant not to sue, execute judgment or take any civil judicial or administrative action against only the Companies which are listed in Exhibit A hereto. The parties agree that the successful completion of the Work by CWM does not represent full satisfaction of all claims for relief to which the United States or the State or local governments may be entitled at law or equity against persons or entities other than the Companies arising out of or relating to the storage, treatment, handling, transportation, disposal or presence or actual

or threatened release or discharge of any materials at, to from or near the Seymour site. The parties contemplate and intend that the United States or the State will assert claims for cost recovery, injunctive or other relief against entities which are not parties to this consent decree to enable the United States and the State to recover the complete relief to which they may be entitled at law or equity. To this end, nothing herein is intended to release any claims, causes of action, or demands in law or equity against any person or entity not a party to this Consent Decree for any liability they may have arising out of or relating in any way to the storage, treatment, handling, disposal, transportation, presence or actual or threatened release or discharge of any materials at, to, from or near the Seymour site.

XIII.

This consent decree was negotiated in good faith by the parties and the United States, the State, and the local governments believe that each of the individual Company's payments described in Exhibit A attached hereto represent a fair and equitable apportionment of each company's responsibilities for Covered Matters. In addition, the United States, the State and the local governments believe that the combined payments of the Companies in Exhibit A represent a fair and equitable apportionment of those Companies' responsibilities for Covered Matters.

Accordingly, the United States and the State intend and believe that each and all of the Companies should not be liable with respect to "Covered Matters" for any payment in excess of the amount paid or commitments made pursuant to this consent decree and agree that this consent decree will be dispositive of each and all of the Companies' duties and liabilities with respect to any other person or entity against whom a claim is made by the United States or the State, or a judgment is rendered in favor of the United States or the State for Covered Matters. To this end, the parties intend to protect each and all of the Companies from being required to pay any amounts for covered matters in excess of the amounts paid pursuant to paragraph III above; to obviate the necessity and expense of having the Companies be or remain parties of record or participate in a suit relating to their liability for "Covered Matters" for the purpose of determining whether they or any of them may be a joint tortfeasor or otherwise additionally liable for "Covered Matters"; to recognize and further the important public policy of settling potential disputes amicably without resort to lengthy litigation, thus expediting the necessary cleanup of the Seymour site; and to protect the rights of the United States and the State from infringement by any person or entity not a party to this Consent Decree. If in any action brought by the United States or the State with respect to Covered Matters, or in any other action arising out of any claim

brought by the United States or the State for Covered Matters any court of competent jurisdiction enters a final judgment requiring that one or more of the Companies must pay sums for Covered Matters in addition to those paid by each such Company pursuant to this Consent Decree, then the United States and/or the State will adjust the total of all such judgments obtained against any other person or entity so that no Company shall be required to pay all or any part of said sum.

XIV.

The Companies agree not to assert any causes of action, claims or demands against the United States or the State including the Hazardous Substances Response Fund with respect to matters arising out of or relating to the storage, handling, disposal, treatment, transportation or presence or actual or threatened release or discharge of any materials at the Seymour site under the statutes, ordinances or common law referred to in paragraph XII herein. However, the Companies reserve against the United States and the State (but not the Hazardous Substances Response Fund), the right to assert any claim, defense or cause of action arising out of or relating to actions taken by the United States or the State at the Seymour site during or after the performance of the Work.

XV.

Each Company agrees that in any suit or claim for contribution brought against it for Covered Matters it will timely

notify the United States and the State of the institution of any such suit or claim, and it will co-operate with the United States in any such suit or claim.

XVI.

The United States, the State, the local governments and the Companies, in entering into this Decree and in order to facilitate a mutually satisfactory and immediate cleanup of the Seymour site, do not admit, accept, or intend to acknowledge any liability or fault by any party hereto with respect to any matter arising out of or relating to the Seymour site. This express denial of any and all liability or fault attaches to any and all matters relating to or arising out of the Seymour site.

XVII.

When notification to the United States is required by the terms of this decree it shall be in writing addressed to: A) Office of Regional Counsel, Region V, United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604; and B) Chief, Environmental Enforcement Section,

United States Department of Justice, Land and Natural Resources Division, Ninth and Pennsylvania Avenue, N.W., Washington, D.C. 20530.

The United States, the State, the local governments and the Companies consent to this decree by their duly authorized representative on this 26th day of October, 1982.

THE UNITED STATES OF AMERICA

By: Carol E. Dinkins
CAROL E. DINKINS
Assistant Attorney General
Land and Natural Resources Division
United States Department of Justice
Washington, D. C. 20530

By: Sara Evans Barker
SARA EVANS BARKER
United States Attorney
274 United States Courthouse
46 East Ohio Street
Indianapolis, Indiana 46204

By: Robert M. Perry
Robert M. Perry
Associate Administrator for
Legal and Enforcement Counsel
and General Counsel

By: Valdas V. Adamkus
Valdas V. Adamkus
Regional Administrator
EPA, Region V

The State consents to this Decree dated October 26, 1982, by its Governor on this 22nd day of October, 1982.

STATE OF INDIANA

By: Robert D. Orr
ROBERT D. ORR
GOVERNOR

Approved by:

Linley E. Pearson
LINLEY E. PEARSON
Attorney General of Indiana

October 22, 1982
DATE

We are also prepared, if requested, to discuss with the committee the technical details of the Seymour site cleanup, and we will, of course, be happy to respond to any other questions the committee may have.

Mr. Chairman, the three files that I have here contain the information and documentation that I have referred to in my statement. This will be available to the committee for its use.

[Mr. Diver's prepared statement follows:]

STATEMENT OF JEFFREY DIVER, VICE-PRESIDENT AND GENERAL COUNSEL, CHEMICAL WASTE MANAGEMENT, INC.

Good morning, Mr. Chairman, I am Jeffrey Diver, Vice-President and General Counsel of Chemical Waste Management, Inc., and I appreciate this opportunity to discuss my company's role in the Superfund cleanup effort.

Chemical Waste Management is a subsidiary of Waste Management, Inc. of Oak Brook, Illinois. Waste Management is the largest firm dedicated to the collection, treatment and disposal of municipal and industrial wastes on a world-wide basis.

We have been specifically asked to address the practical aspects of cleaning up abandoned hazardous waste sites. Our recent experience with the Seymour Recycling Center, in Seymour, Indiana, is our principal case in point today.

The prompt surface clean-up of this sizable site could only have been accomplished with the constructive cooperation of both the private enterprises and public agencies involved. We are eager to share with you our experiences and the lessons we learned as contractor for this voluntary clean-up effort.

Chemical Waste Management first became involved with the Seymour Recycling Center in April, 1980. Representatives of IBM and Cummins Engine Company contracted with CWM to remove approximately 2,000 drums of waste materials from the Seymour site.

Chemical Waste Management's second contact with the Seymour site came almost two years later, in January, 1982, when IBM representatives advised us that a group of generators was considering funding a voluntary cleanup at Seymour. Chemical Waste Management, and two other companies, were invited to present estimates for a surface cleanup to this generator group. My company's general estimate was $9.5 million, the lowest of the three submitted.

Following the submission, we were informed that the group originally proposing a voluntary cleanup had been disbanded. But in late July or early August, 1982, CWM was again approached by IBM and advised that a new and smaller group of generators had been formed in order to complete a voluntary surface cleanup. We were asked to work with this group and to perform a surface cleanup on their behalf.

Our selection was based on our previous low bid, our good business experience with many of the generators in this new group, and the fact that Chemical Waste Management, and its affiliates, possessed their own permitted sites and facilities capable of disposing of Seymour waste.

Upon our selection as contractor, Chemical Waste Management prepared a second, more extensive technical proposal for the surface cleanup. Between August to October 26, 1982, we met at various times with the generator group, the Environmental Protection Agency and the Department of Justice to work out the technical requirements for the Seymour cleanup. After field investigations at the site, our company's Environmental Remedial Action Division (ENRAC) developed a program to identify, collect, package, transport, treat and dispose of several thousand drums, miscellaneous chemicals, tanks, surface debris and soil located at the site.

This work plan is incorporated in Exhibit B of the final consent decree submitted to the Federal District Court of the Southern District of Indiana on October 26, 1982, and signed on December 8, 1982.

ENRAC began the surface cleanup at Seymour in December 1982, and the work was completed some thirteen months later, on January 19, 1984. While the original consent decree envisioned a 50 week schedule for completion, the soil excavation phase of the work was delayed by twenty inches of rainfall in October and November of 1983, which inhibited earth-moving operations and impeded our efforts to implace clay soil. An extension of the original 50-week schedule was granted by the Federal court, and January 24, 1984, was set as the new completion date. We came in five days early.

While our original estimate for the cost of the project was $9.5 million, we received $7,644,000 under the consent decree. We were also required to secure a $15

million completion bond. As further insurance that the cleanup would conform to the consent decree, Chemical Waste Management signed the consent agreement independently and became an official party to that agreement.

The involvement of Chemical Waste Management in the Seymour cleanup was complicated by the inclusion in the generator group of a company called Waste Resources of Tennessee which was a subsidiary of a subsidiary of a subsidiary of a company acquired by Waste Management, Inc., my own company's corporate parent, on February 27, 1981.

In a multi-million dollar transaction, Waste Management acquired EMW Ventures, Inc. and its subsidiary, Warner Company, which includes Waste Resources Corporation, of which Waste Resources of Tennessee is a very small part. At some time prior to Waste Management Inc.'s acquisition of EMW Ventures, Waste Resources of Tennessee apparently shipped several drums to the Seymour Recycling Center. According to later EPA estimates, the total waste shipped from Waste Resources of Tennessee to Seymour was less than one-tenth of one percent of the total waste found on the site. On May 14, 1982, potential responsible party (PRP) correspondence was mailed to Waste Resources of Tennessee by EPA.

But Chemical Waste Management did not know of its connection with Waste Resources of Tennessee as a potential responsible party at Seymour until well after our submission of estimates and technical proposals to the generator group and the EPA.

Upon learning of the connection, we decided to include Waste Resources of Tennessee, as a partner in the final group of generators for surface cleanup of the Seymour site.

This decision was based on two principal factors:

First, Chemical Waste Management was initially unsure of the extent of Waste Resources' liability at the Seymour site. Not until after the consent decree was submitted to the Court did we discover that the share of the cleanup allocated by EPA to Waste Resources was $18,946. We were informed of this fact in correspondence received from EPA on November 3, 1982.

Second, several of the generators, upon learning of Chemical Waste Management's connection with Waste Resources of Tennessee, felt that the legal position of Chemical Waste Management as the contractor would be improved by the inclusion of Waste Resources as a party to the Seymour consent decree. We tended to agree.

Speculation has since arisen that Chemical Waste Management joined the voluntary cleanup group solely to gain an exemption from further groundwater or subsurface cleanup liability. But at the time that Waste Resources of Tennessee joined the other generators in the cleanup effort, neither Chemical Waste Management nor any of the generators were aware of the final decision by EPA and the Justice Department to provide a total exemption from further liability.

Until very late in the negotiations between the generators and the government agencies, it was even unclear whether the final negotiated document would be in the form of a consent decree or a covenant not to sue, or whether it would include any exemption from further liability.

Following the issuance of the consent decree, a meeting was held among representatives of the parties to the decree: several generators, EPA Region Five officers, the Department of Justice and Chemical Waste Management. The meeting was chaired by Stephen S. Ramsey, Chief of the Environmental Enforcement Section of the Justice Department's Land and Natural Resources Division. The meeting concentrated on four major issues raised by the Justice Department, involving Chemical Waste Management's cleanup operation.

For the Committee's benefit, I will summarize the background and resolution of these four issues:

(1) Monthly reports: Chemical Waste Management was required to provide the Federal Court, U.S. Department of Justice, and the State of Indiana with a written status report on the progress and completion of the cleanup every 30 days until the work was finished. The Department of Justice advised us at the March 7 meeting that since the cleanup had begun in late December of 1982, two monthly reports were past due. The two delinquent reports were filed three days later, and Chemical Waste Management never again filed a late report during the remaining eleven months of the project.

(2) CWM truck accident: On January 25, 1983, a Chemical Waste Management truck removing crushed barrels and debris from the Seymour site was involved in a single-vehicle accident. A power take-off on the truck was accidentally engaged while the truck was in highway transit, causing the body of the vehicle to raise and strike an overpass. According to the official accident report, three drums and approximately one-half cubic yard of debris were spilled onto the pavement.

The first official on the scene was an officer from the County Sheriff's Department, who called the Indiana State Emergency Response Team with a request for assistance. The officer also notified the Indiana Stream Pollution Control Board of the incident. The Indiana Emergency Response Team and a Chemical Waste Management crew quickly cleaned up the accident scene, and my company dispatched one of our managers to inspect the site and document its thorough restoration.

Chemical Waste Management was subsequently assessed a $250.00 penalty by the Indiana Stream Pollution Control Board for failing to notify the board of the accident. While we believe there was no reason to contact the stream pollution board since the Sheriff's deputy had already done so and since the spill was not in or near any waterway, we nevertheless decided not to contest the penalty because of the de minimus amount assessed.

Having failed in this instance to cover the cargo area of one of our trucks with a protective tarpaulin, Chemical Waste Management promptly assured the Department of Justice that in the future all our trucks would be tarped and that other transportation procedures required by the Work Plan would be strictly adhered to.

(3) The shipment of Seymour wastes: As noted by the Department of Justice, some Seymour waste materials were shipped between January and March, 1983 to a site affiliated with Chemical Waste Management but not listed in the work plan. This site was the Evergreen Landfill, located in Northwood, Ohio. As we stated at the March 7 meeting and in a March 29 letter to the Department of Justice, the list of facilities included in the work plan should have been construed as illustrative and not all-inclusive. Nevertheless, Chemical Waste Management immediately ended its shipments to non-specified facilities. Fifty-two such shipments were made to the Evergreen facility before we ceased those shipments in March, 1983.

We subsequently requested an amendment to the consent decree to permit the disposal of certain Seymour waste at the Evergreen landfill, and this amendment was approved by the Department of Justice.

(4) Drum-crushing operations: As for the last issue raised by the Justice Department, I am submitting as an appendix to this testimony our letter of March 21, 1983, to the Regional Counsel of the Environmental Protection Agency's Region Five. This letter offers a thorough explanation of the variance from work-plan specifications in the construction of a drum-crushing pad, our proposed modification of the work-plan specifications, and the EPA's approval of this modification.

In addition to remedying all the performance deficiencies cited by the Justice Department, Chemical Waste Management independently added on-site management personnel to monitor compliance with the work plan. We implemented internal audit procedures to assure full compliance with the consent decree. A contract administrator was assigned to the Seymour site at all times. An engineer from our corporate environmental management department was sent to the site to monitor sampling, analysis and disposal activities. And an independent consulting firm was hired to review overall procedures and systems to insure compliance with both the work plan and the consent decree for cleaning up the Seymour site.

In conclusion, Mr. Chairman, we believe Chemical Waste Management's experience at the Seymour site was a successful one. We are frank to acknowledge that mistakes were made, but we are proud to report as well that the mistakes, when discovered, were quickly corrected and controls improved.

For the Committee's convenience and review, we are submitting today copies of the Consent Decree, our detailed work plan and all of the monthly reports we submitted to the Court.

We are also prepared, if requested, to discuss with the Committee technical details of the Seymour surface cleanup, and we will, of course, be happy to respond to any other questions the Committee may have.

Mr. LEVITAS. Thank you very much. We will receive those files as part of the records of the subcommittee and will place such of those documents in the record of this hearing as are determined to be pertinent to these proceedings.

Thank you very much.

Is Chemical Waste Management a—it's a subsidiary, as I understand it, of Waste Management?

Mr. DIVER. Of Waste Management, Inc.

Mr. LEVITAS. Is Waste Management, Inc., a publicly held company?

Mr. DIVER. It is publicly held and is part of the New York Stock Exchange, a Delaware corporation.

Mr. LEVITAS. Do you happen to have with you today a copy of the last annual statement of the company?

Mr. DIVER. I do not, Mr. Chairman. We will supply a copy of that promptly to the committee.

Mr. LEVITAS. I have a series of questions that I want to get into, but I think at this point I will recognize the gentleman from New York, Mr. Molinari.

Mr. MOLINARI. Thank you, Mr. Chairman.

On the structure of Waste Management, Inc., I've heard your testimony that Chemical Waste Management is a subsidiary corporation. Now, I take it from what I've seen that Chemical Waste Management, Inc., has a separate set of subsidiary corporations.

Mr. DIVER. It has separate subsidiary corporations, but in the context of Seymour the Enrac group is a division of—that is, it is a "doing business as" name of Chemical Waste Management, but it is not a separate corporate entity.

Mr. MOLINARI. Enrac?

Mr. DIVER. Enrac.

Mr. MOLINARI. What I'm trying to determine is, I'm looking at Moody's Production Manual and I see hundreds of corporations that are part of or under the umbrella of Waste Management, Inc. And what I am trying to determine is: How many corporations are there that deal with disposal and cleanup of chemical waste?

Mr. DIVER. The principal company operation—when I say "company" I'm now talking about Waste Management, Inc., and all of its subsidiary corporations—is the Environmental Remedial Action, a division of Chemical Waste Management, Inc. It was not always so, but it is today.

Mr. MOLINARI. Well now, getting back to numbers, what I am trying to determine is how many corporations are there. From what I understand and from what I've read, your company has gone about purchasing sites, for example, that are disposal sites. That's one of your big assets. We're told here that even at Seymour one of the reasons you got the job was because you had so many sites where your competitors would not have that same advantage. I'm trying to get an idea of how many corporations you acquired for that purpose.

Mr. DIVER. I can't provide that to you accurately now, Mr. Representative. I will provide that information to you. I can tell you that within the chemical waste management group we are probably talking about 19 facilities nationwide, most of which are currently owned directly by Chemical Waste Management, Inc. Perhaps as many as two are owned by subsidiaries of Chemical Waste Management, Inc.; and at least one of which is owned by a subsidiary of Waste Management, Inc., but it is within the chemical waste management group. As to how many companies have been acquired for the purpose of acquiring RCRA permitted or State permitted disposal facilities, I would prefer, rather than guessing at that particular number, to provide that to the subcommittee in supplemental testimony, if that is acceptable.

[Information received from Mr. Diver follows:]

CHEMICAL WASTE MANAGEMENT, INC., RCRA PERMITTED SITES ACQUIRED

Name	Date acquired	Date merged
1. Stabatrol Corp	Nov. 18, 1980	N/A.
2. National Industrial Services, Inc	Dec. 15, 1980	N/A.
3. MP Disposal Co., Inc	Aug. 6, 1981	December 1, 1981.
4. Overley's Inc	Sept. 17, 1981	December 5, 1981.
5. Interex Corp	Nov. 24, 1981	Name changed to Chemical Waste Management of Massachusetts, Inc., November 24, 1981.
6. Environmental International, Inc	April. 2, 1982	December 27, 1982.
7. Solvent Resource Recovery, Inc	Nov. 10, 1982	N/A.
8. Trade Waste Incineration, Inc. (assets only)	Aug. 10, 1983	d/b/a Trade Waste Incineration.

Mr. MOLINARI. Is that an ongoing procedure? You're still having sites done. Are you in the process of acquiring any at the moment?

Mr. DIVER. At the moment?

I couldn't say that we are actually in the process of acquiring any. We continue to look at company's involved in the treatment and disposal of hazardous waste, and if a particular company comes along that interests us, we may initiate discussions. But at the moment I am not aware that we have actually gotten close to an acquisition.

Mr. LEVITAS. Mr. Molinari, if I may point out that there is a quorum call in process on the floor of the House right now, and the subcommittee will stand in recess.

[Recess.]

Mr. LEVITAS. The subcommittee will please come to order.

The gentleman from New York.

Mr. MOLINARI. Going back to your testimony, when you started off you indicated that Waste Management is the largest firm dedicated to the collection, treatment, and disposal of municipal and industrial waste on a worldwide basis. Are you not also the largest corporation in the country dealing with the disposal of hazardous waste?

Mr. DIVER. Yes. I expect that's true.

Mr. MOLINARI. I thought I had read that someplace.

Mr. DIVER. I expect that's true.

Mr. MOLINARI. OK. Now, I want to go through the process with you to see if I can't understand a little better the nature of your acquisition of sites. I'm talking about ongoing sites; sites that are operating. What process do you go through when you have a site that's available? If it's a disposal site that's brought to your attention that it's for sale, how do you evaluate and make a determination whether to buy or not to buy?

Mr. DIVER. As a general rule, we are not focusing on sites, per se. But obviously, a corporate entity, generally, which owns assets which could include the treatment and disposal facility. When we have identified the company that is so-called on the block or the word on the street is that they would like to sell, in the ordinary event we will send a number of people to that particular company to make some determination as to what it is that they are looking for. We will make a financial evaluation of the operation to see whether or not the amount of money that's being talked about in

terms of a request is persistent with the current and projected earnings for the operations which that company has.

And at that time we will look at such things on a rather superficial basis—the existence of permits, do they have the required permits that are necessary from State, local, and Federal agencies.

If it is determined on a financial basis that the enterprise is a good acquisition candidate, then an environmental evaluation is made by—in the general circumstance—our Waste Management, Inc. Environmental Management Department. They go to the facility and go to State regulatory agencies to determine what the pluses and minuses are for environmental regulatory compliance perspective so that we can make a judgment then as to whether the liabilities that are associated with a particular operation are consistent with the price that is being discussed for the company.

And if we can get some kind of conjoinment between the economic viability of the facility, and an assessment of the liability, as best those can be established, we will then make that judgment as to whether or not to make an offer to the company or engage in negotiations toward it. There have been circumstances where in which we have even gotten to the point where we made a public declaration of our intent to acquire a company and then have conducted an environmental or compliance audit and had determined that the liability seemed to exceed what the purchase price would allow and have discontinued negotiations.

Mr. MOLINARI. When you acquire a corporation, is it a matter of corporate practice to continue the name of that corporation? To continue the corporate entity?

Mr. DIVER. As a matter of general practice with regard to treatment and disposal, the answer is "Yes."

Mr. MOLINARI. Why would that be?

Mr. DIVER. Well, because generally the person who is selling the company, for tax purposes, wants to have a merger of the two companies. And if there is a merger of the two companies, then all of the assets and liabilities of the acquired company are being acquired by Waste Management or the Waste Management subsidiary completing the acquisition. There are tax issues that are involved with the seller with regard to how it is going to be structured.

There are also issues on our end as to the liability. It is possible and feasible to cut-up the liabilities and just pick up the assets. That may be considered. But in the ordinary event with regard to fixed facility, we are talking about a merger-type acquisition in which all of the stock of the selling corporation is acquired by my corporation.

The name continues for a period of time because there is a certain customer-identification with the name. After a period of time then, it generally changes to Chemical Waste Management, Inc.

Mr. MOLINARI. Can you give us a list of those corporations that you acquired in the field of disposal of hazardous waste where the name was discontinued and Chemical Waste Management, Inc. took over the company.

Mr. DIVER. I can certainly provide that to the committee. Yes.

Mr. MOLINARI. The question of liability—Mr. Levitas and I jokingly refer to the fact that we used to be lawyers and I'm not sure

whether or not we are anymore—but I recall that a lawyer would have to be necessarily hesitant in purchasing any stock of a corporation not knowing of the outstanding liabilities. Now, it would seem to me in dealing with the nature of the subject which has evoked a great deal of controversy around the country, that the liability factor for a disposal site has to be something that would be of very deep concern to anybody who wants to acquire a site. That you may be, in fact, acquiring a severe headache.

Mr. DIVER. True.

Mr. MOLINARI. And it only makes sense that you would want to keep the corporate entity alive so that you limit the liability of the acquiring company.

Mr. DIVER. I think, in the main, that as far as—I can only talk about our own personal experience. I think the management of Waste Management, Inc. has or feels a moral commitment to rectify problems that occur at facilities which it ultimately owns whether or not there is a separate corporate shell that may exist. I don't think, realistically, that that's something that comes into play in our corporate mental processes about the acquisition of a company.

Mr. MOLINARI. You mean whether or not——

Mr. DIVER. Whether or not we can shield a higher corporate entity from the liability of the lower. Because we are in the business, and expect to be in that business for a long time. And if we develop a reputation with regulatory agencies or customers of trying to walk away from problems that exist or discover at the facilities that we have acquired, we are not going to be in the business for very long.

Mr. MOLINARI. Well, you are general counsel to Chemical Waste Management?

Mr. DIVER. That's correct.

Mr. MOLINARI. And you're suggesting that you would not seek to shield the parent corporation from the unknown impact of a corporate facility that you are acquiring?

Mr. DIVER. What I am suggesting, Mr. Representative, is that the judgments, with respect to liability as best they can, should be identified up front and go into the consideration of acquisition of the company. But, on the other hand, if we have walked into a situation that is causing a problem, it is unlikely that we, as a corporate entity with the intention of being around 10, 20, 50 years from now, can realistically walk away from it.

Mr. MOLINARI. How many corporations have you acquired where they immediately became part and parcel of Chemical Waste Management?

Mr. DIVER. I would suggest the vast majority of them immediately became part and parcel to Chemical Waste Management, Inc.

Mr. MOLINARI. In looking at the subsidiary corporations of Waste Management, Inc. there are an incredible amount of subsidiary corporations.

Mr. DIVER. Yes.

Mr. MOLINARI. Virtually every State where you have an operation going you have a separate corporation.

Mr. DIVER. That's correct.

Mr. MOLINARI. Now, I could understand in some cases that might be a tax advantage due to the structure of the tax laws in the particular state, but——

Mr. DIVER. Correct.

Mr. MOLINARI [continuing]. But where I begin to see a persistent pattern in every State where you have accepted corporations. I'm wondering—I would assume if in every case there would be tax advantages—in fact, there might be some tax disadvantages.

Mr. DIVER. In most of those circumstances, I think you are going to find that it is the tax advantage that was the focus. As the company grew—and we're talking now in terms of waste management or a company that is really still in its infancy. We are talking about a company that as a public company has existed for 11 or 12 years. And which grew by acquisition of other corporations that were involved in the transportation, storage, treatment, and disposal of various types of waste.

As time went on, there had to be periods of consolidation—we couldn't keep acquiring and acquiring and never get ahold of everything that we had acquired. And so, we have found that there has been the necessity and have tried within a single State where there used to be 15 or 16 different corporations to consolidate them all within a single corporation within that State.

Because, for Waste Management, Inc. businesses, their businesses are mainly refuse hauling and disposal which are local. They are not interstate, they are intrastate. And the determination was made to have a single corporate entity in each of those States. And the tax consequences were the primary focus.

Mr. MOLINARI. Do you know, of your own knowledge, whether Chemical Waste Management, Inc. ever considered purchasing the Seymour site?

Mr. DIVER. I can tell you that Chemical Waste Management, Inc. never considered purchasing the site, but did consider purchasing a part of that site.

Mr. MOLINARI. I would like you to, if you would, expand upon that so we know what you are talking about.

Mr. DIVER. There was internal discussion about the possibility and consequences of purchasing, from the city of Seymour or the airport authority, the top foot of soil at that site.

Mr. MOLINARI. That's not talking about part of the site. I mean, that really would not be real estate but personal property.

Mr. DIVER. I don't think we even got to the extent of determining whether it was realty or personal property that was being discussed. But there was that discussion—whether that was something that would be advantageous.

Mr. MOLINARI. Why would you want to purchase the top foot of soil at Seymour?

Mr. DIVER. The discussion at that point in time involved whether——

Mr. MOLINARI. I would think that from what we have learned, it would be the other way around. They might want to have you get paid for taking that top foot of soil.

Mr. DIVER. I think the quantum of consideration that might have passed in that transaction would have been modest. But, nonetheless, it was seen as a possible way to involve Chemical Waste Man-

agement, Inc., directly in the cleanup. Not just as a contractor, but if it had acquired the top foot of soil, it would have a direct liability, at least for that foot of soil—and therefore might be in a better position with regard to being a contractor.

Mr. MOLINARI. Oh, I see. To get your foot in the door, in other words, essentially, for bidding on the total cleanup.

Mr. DIVER. Correct.

Mr. MOLINARI. But you managed to do the same thing anyway with the acquisition of Waste Resources or whatever that was?

Mr. DIVER. I'm glad you brought that up. As you say, we managed to do that. It wasn't something that we managed to do. Waste Resources of Tennessee, Inc., kind of came along as a modest tail in a rather large acquisition in the $100 million range. It was a corporate entity that probably wasn't functioning as a profitmaking enterprise at the time but which had, obviously, in the past by virtue of having sent wastes to other people's facilities, acquired liabilities that were defined in the Superfund law in December 1980.

The Department of Justice notified Waste Resources of Tennessee in May—mid-May, I believe it was—1982, of its potential responsible party status, and that was then communicated to me. But until that time, I can assure you that Waste Management, Inc., which was the ultimate corporate entity in the hierarchial chain, did not know that Waste Resources of Tennessee had, in the past, taken waste to the site.

And what we are talking about here are 22 drums of waste. So it was hardly something that we created for our acquisition in February 1981. It was something that came as a consequence of that acquisition—albeit, unknowing.

Mr. MOLINARI. So, if I understand you correctly, what you are saying is that you really didn't know when you purchased the parent corporation of Waste Resources of Tennessee that you were picking up a potentially responsible party.

Mr. DIVER. That's correct. But it was there, nonetheless.

Mr. MOLINARI. But it was there. And it did give you that foot in the door that you were seeking anyhow.

Mr. DIVER. It obviously served that potentially beneficial purpose, albeit it was viewed at the time as a liability.

Mr. LEVITAS. Would the gentleman yield?

Mr. MOLINARI. Sure. I will be glad to yield.

Mr. LEVITAS. It was my recollection that there was a corporate acquisition between Waste Management and——

Mr. DIVER. EMW.

Mr. LEVITAS [continuing]. EMW. That among the other documents that are provided is a list of the subsidiaries of the corporations that they acquired. I am sure this was done in this instance.

Mr. DIVER. Yes, sir.

Mr. LEVITAS. In addition to that, it is my recollection—or at least people tell me, that you also get certification from counsel with respect to liabilities and contingent liabilities of the corporations being acquired. Was that done in this instance?

Mr. DIVER. Yes. To the extent that it was done, I am sure the chairman is aware, that counsel for a corporation, not themselves knowing what activities were permitted, performed, or allowed by the corporate entity for which they are providing certification,

hedged rather substantially. So, to the extent that I know anything, I don't know that there is a liability associated with this.

Mr. LEVITAS. I am sure that is the case, but with able counsel representing the acquiring corporation, and needing at some point, perhaps, to rely on the opinion of counsel of the selling corporation, they generally say: "Well, why don't you make the investigation? Why don't you get the corporate officers and have them give you certifications or affidavits so that you can base your * * *" What I am trying to get at is what was contained in the documentation at the time of acquisition relative to the operation, the liability, the contingent liability, of this subsidiary corporation, this Tennessee operation.

Mr. DIVER. I am going to advise the Chair that I expect—and I am going to learn—that there were very few, if any, representations involving the individual separate subsidiaries of EMW. And I am going to find a general series of warranties and representations by EMW.

But having not been involved in the acquisition of the EMW operation, I can't testify to my first-hand knowledge. I am under oath.

Mr. LEVITAS. OK. What——

Mr. DIVER. But if you do wish to have that information, again, we have it.

Mr. LEVITAS. Also, it would be my guess that Waste Management supplied a certified financial statement, which, among other things, would have either have had a separate financial statement for the subsidiaries, or would have a footnote reference as to contingent liabilities. And it is again my understanding that in preparation of such a financial statement certified by an independent public accountant, using generally accepted accounting practices, that they would have done an audit of some sort to identify those liabilities so that they can either make certification or exemption.

And if you would—I take it you're going to say that you don't know that of your own knowledge——

Mr. DIVER. I really don't. I really don't.

If I could just caution—what I'd like to tell the subcommittee is that especially in the circumstances of these particular transactions, Superfund law was passed in December 1980, and whether the committee believes it is true or not, it is perceived as having changed liabilities. Some think it was a complication, but others view it as an actual change in the liability of a generator of waste. Or in this particular case, an intermediary. Because that's what Waste Resources was. It apparently got ahold of some drums from somebody else and determined that it could not dispose of them, and had them taken someplace else.

So I doubt whether you would ever had expected that either a financial auditor or some other internal auditor or counsel would have been appreciative of the fact that 22 drums of waste from Waste Resources of Tennessee would have amounted to a liability. Especially if you consider that no one even knew if it was joint and several liability. If you said it was liability for 22 drums, maybe that's this amount. But if you tell me that it is joint and several liability, and I may be liable for the entire site, well, that's another matter.

I just throw that into the hopper. Not that I know the answers to your particular questions. I will get the answers, but I think in the context of the law, the area that you are pursuing probably wasn't very meaningful to outside counsel or corporate counsel.

Mr. LEVITAS. I'll take that at this point.

As I understand it, this merger or acquisition was in January 1982——

Mr. DIVER. February 1981.

Mr. LEVITAS. February 1981. And the lawsuit that was brought by the State of Indiana was March 1980——

Mr. DIVER. I believe it was May 1980. And it would have been against the Seymour Recycling Corp.

Mr. LEVITAS. That's the Federal suit. The Indiana suit was in 1978; wasn't it?

Mr. DIVER. OK.

Mr. MOLINARI. On page 5 of your testimony, Mr. Diver, you have an interesting statement: "Several of the generators, upon learning of Chemical Waste Management's connection with Waste Resources of Tennessee, felt that the legal position of Chemical Waste Management as the contractor would be improved by the inclusion of Waste Resources as a party to the Seymour consent decree." How would your legal condition be improved?

Mr. DIVER. We're talking now about perceptions. Not that the legal position would actually have improved, but that perceptions by both generators and USEPA.

Mr. MOLINARI. Would you mind identifying who these generators were?

Mr. DIVER. I can't individually. At the time—I should advise the subcommittee that at the time we are talking about here, the position which I had occupied was senior environmental counsel for Waste Management, Inc. That I have only, as of late last year, assumed the position of general counsel at Chemical Waste Management.

So, to try to address your question, no. I can't tell you who those individuals were except, of course, to try to identify them—and I certainly will make an attempt to.

But as I understand the issue that was involved, it concerned whether or not USEPA could try to bind a contract cleanup person to a consent decree. What the consideration would be given that USEPA was not going to be spending its money for the cleanup. And that in an earlier cleanup effort in another part of the country, EPA got some mental satisfaction from the fact that the cleanup contractor had actually been a potential responsible party at the site and so they proceeded they had some kind of hook in him.

Well, until it was realized by all parties that Waste Resources of Tennessee, Inc. was a potential responsible party and was a sub, sub, sub, sub, subsidiary of Waste Management, Inc., which was itself the parent of Chemical Waste Management, Inc., that hook was not identified. Because Chemical Waste Management, Inc., corporately had no responsible party status with regard to Seymour. But when that fact came to the realization of the generator group, I think they thought it would be easier for them to sell their package to EPA and EPA would have, mentally, an easier time accept-

ing it by virtue of the fact that an affiliate company of Chemical Waste Management, Inc. had hierarchy status.

Mr. MOLINARI. Now, in your testimony you talk about the actual legal responsibility as it was determined—and I think the figure is in here—some minor figure like $16,000——

Mr. DIVER. $18,000——

Mr. MOLINARI. $18,000——

Mr. DIVER. Almost $19,000.

Mr. MOLINARI. $19,000.

Now, to be one of the "gang of 24" as it has been characterized here, you had to put up a minimum of $100,000?

Mr. DIVER. That's correct.

Mr. MOLINARI. Now, I raised the question yesterday and I'll raise the same question today. Why would you put up $100,000 when, in fact, your liability was only $18,000.

Mr. DIVER. Well, at the time we didn't know it was only $18,000.

Mr. MOLINARI. Well, suppose somebody said to you that you had to put up half a million dollars. Would you put up half a million as readily as a $100,000?

Mr. DIVER. I'm not so sure of that.

All I can tell you, Mr. Representative, is that the $100,000 figure did not appear so onerous as to afford an obstacle to Waste Resources of Tennessee, Inc.'s having its liabilities or whatever constrained, limited or absolutely eliminated, by virtue of the consent decree.

At that point I was, as I indicated to you, senior environmental counsel for Waste Management. My interest at that point was to assure that Waste Resources of Tennessee, Inc.—one of our corporate family, was going to obtain whatever the benefits were going to be of Chemical Waste Management, Inc.'s participation as a contractor. And if there was going to be a consent decree, to get involved in it and get the liabilities terminated rather than become involved in a lawsuit that could cost us as much in legal fees as any amount that we might ultimately incur.

Mr. LEVITAS. Would the gentleman yield?

Mr. MOLINARI. I would be glad to.

Mr. LEVITAS. Let me ask you this: Based on your research or your understanding, are liabilities under RCRA or Superfund dischargeable in bankruptcy?

Mr. DIVER. I haven't researched the question, Mr. Chairman, so I can't answer in terms of any research.

Mr. LEVITAS. Well, what I am getting at is if this was a defunct subsidiary——

Mr. DIVER. It wasn't defunct. It was continuing to operate. Indeed, it was continuing to provide for final closure of the landfill which it had operated in the State of Tennessee.

Mr. LEVITAS. So it was still an operating company?

Mr. DIVER. Yes.

Mr. LEVITAS. Was it insolvent at the time?

Mr. DIVER. One might argue that it was. Because, obviously, as I said in my remarks earlier, it was not a profit making company.

Mr. LEVITAS. So there was no way you could just simply limit your liability by casting off that corporation?

Mr. DIVER. I don't think so. I really don't think so.

As I say, when we are talking about ultimate responsibilities, frankly, in our internal discussions corporate lines get erased real easily.

Mr. MOLINARI. I have to disagree with you in your answer to the chairman. We've seen many cases where corporations were being chased by the Environmental Protection Agency. One consideration is: can we get money from them? If they're insolvent are they going to fold up their tents and say: That's it. And indeed, we've seen that practice all over the country.

And you're general counsel and you're saying that you don't think liability could have been foreclosed by filing bankruptcy, that their liability would have continued even if you——

Mr. DIVER. Well, we didn't really have to get into that issue. Nobody, at that time, at least as far as I know, was pursuing Waste Resources. I mean, Waste Resources was, all in all, small potatoes with regard to Seymour. All we're talking about now is was it good business judgment or not to contribute $100,000 to a consent agreement decree package, obtaining whatever the benefits of that were, given the potentiality that the actual liability for that corporate entity might be $19,000 or $20,000.

Mr. LEVITAS. If the gentleman will yield again.

I think the thrust of Mr. Molinari's point is that we have many examples around the country where corporations are placed into bankruptcy to avoid these liabilities. Now, either there was an insulation of liability capable of being accomplished through this subsidiary of EMW, or, a worse consequence would be that there was no ability to do that and the liability spreads to another deep pocket and involves Waste Management, Inc. if there could be a penetration of it's corporate shell. Or, there could be some other reason why it was advantageous to Chemical Waste or Waste Management to kick in $100,000 having nothing to do with liability.

Mr. DIVER. Well, all I can tell you with regard to what other corporate entities may do with respect to either bankrupting or buying bankrupted organizations, I can't speak to what those corporations motivations might be. We don't do that. And we don't try to. I can't think of a single circumstance where we have ever raised insolvency.

Mr. LEVITAS. You make the point several times in your prepared statement that you did not know there was going to be any discharge of potential liability.

Mr. DIVER. That's right.

Mr. LEVITAS. Well, you can't have it both ways.

Mr. DIVER. No, No; I'm not asking to have it both ways. All I and environmental counsel for Waste Management sought was whatever the benefit of the bargain was going to be, assuming that there would be some benefit to the bargain, that I wanted Waste Resources of Tennessee to participate in that benefit. And $100,000 did not seem excessive at that point in time.

Mr. MOLINARI. Now we're hearing something different. If you're suggesting to the subcommittee that the $100,000 that was put up was put up as an investment, an investment whereby you might walk away with or have an inside track on getting the cleanup operation for the Seymour site, that would make some sense to me. It might well be worth an investment of $100,000 to get your foot in

the door and be with the inside group. But if you're suggesting, as I understand it, that somebody called you and you got nervous thinking you might be deemed the responsible party, and without doing any investigation and told you you had to pay $100,000 to let you get off the hook——

Mr. DIVER. Obviously there are two things that are happening in parallel here. As I say, the Waste Resources PRP letter comes to the general counsel's officer of Waste Management, Inc. and as it was an environmental matter, it was assigned to me. Coincidentally, Chemical Waste Management is pursuing activities with regard to generators and who knew who else at that point concerning obtaining, possibly obtaining, a contract for the cleanup of Seymour.

Communication was made ultimately between the two entities—my office and Chemical Waste Management's office concerning that Waste Resources of Tennessee is a potentially responsible party in this circumstance. At that point in time, for whatever its purposes were, Chemical Waste Management, Inc. saw fit to involve Waste Resources of Tennessee as a potential responsible party in terms of the business aspect.

I, from my side, saw that the people at Chemical Waste Management would be most interested in having it on the business side, so that was an additional plus in the column of "Do we pay $100,000 at this time or not."

Mr. MOLINARI. OK. Now if you are correct then we are seeing and witnessing a tremendous miscarriage of justice. We have three solid lists here of corporations—some big names—who didn't have the opportunity that you had. Didn't have the opportunity to put up $100,000 and say: "We're going to walk away." Assuming that their share was $100,000 or less; and if, in fact, their general counsel's opinion was it would be good for them to get out.

You see, that's one of our problems with this site. Was everybody treated fairly and equally. EPA said they were. What I'm hearing is that they weren't. You were one of the fortunate few. Using your own logic and your own legal reasoning you were able to buy out with $100,000. And the question we have to ask—and I don't suggest you have the answer—why wasn't that same opportunity afforded equally across the board so that they could all walk away, and if nothing else, save in excess of that figure in legal fees. If that were the true cost of legal representation.

Mr. DIVER. Obviously, Mr. Representative, I just can't tell you what happened with respect to that, not being personally involved myself.

Mr. LEVITAS. Were you not the attorney working with Mr. Topol?

Mr. DIVER. No; I was not.

Mr. LEVITAS. Who was the attorney working with Mr. Topol?

Mr. DIVER. It would have been, in-house, a Mr. Jeffrey.

Mr. LEVITAS. Jeffrey is the last name?

Mr. DIVER. Yes.

Mr. LEVITAS. What's that first name?

Mr. DIVER. Bill. William.

Mr. MOLINARI. The original bid that you made, Chemical Waste Management, is $9.5 million, I think you corrected it to $9.8 million——

Mr. DIVER. Yes; $9.8 million.

Mr. MOLINARI. That's the figure that we heard yesterday. And when you submitted that bid of $9.8 million, you had two competitors that submitted bids at the same time——

Mr. DIVER. That's our understanding.

Mr. MOLINARI [continuing]. Somewhere between $11 and $14, I think were the figures that we heard.

Mr. DIVER. I don't know, for a fact, what figures were submitted by either of those entities.

Mr. MOLINARI. Now, you say you received, according to your testimony on page 4, $7,644,000 under the consent decree. I don't see any reference in the consent decree spelling out that your corporation was to receive that sum of money.

Mr. DIVER. My understanding is that that was the amount that was established in the trust fund that was going to be the delimiting factor for what we would receive, and that was $7.7 million.

Mr. MOLINARI. Let me ask you this: If, in fact, the original estimate was $9.8 million, how could you possibly reduce it by $2.2 million and still contemplate walking away with reasonable profits.

Mr. DIVER. I'll answer first, but then ask Mr. Bock to supplement my answer.

At the time the $9.8 was being discussed, we had a quantum of information, or knowledge about the site. We had gone to a certain level of detail with respect to identifying what actually had would have to be done. The $9.8 would have to be viewed as—if you looked at the hierarchy of certainty and put blue sky as the top and rock as the bottom, that was much more to the blue sky end.

And as we had to focus in on what was at the site, what was the condition of the material at the site, what would we likely find, where could we likely take it, how would we have to treat it, and go into the detail, we found we could refine our figure further and still, in our judgment, make a profit.

Mr. MOLINARI. I think we've heard that there was a rather hard fought battle here by Mr. Topol and his group—"tough negotiating" I think was the term he used—that resulted in that reduction, if I understood him correctly.

Mr. BOCK. No; I believe Mr. Topol's comments were related to the negotiation of the consent decree. As Jeff has indicated, when we put together the original $9.8 million number, it was based upon a very, very loose, very general scope of work. Obviously, into something like that, we built in a great deal of contingencies because there are a lot of unknowns.

Mr. MOLINARI. If I may interrupt you a minute? Was that $9.8 million bid a legitimate bid that could have been accepted by the other side? Or was this just a ballpark estimate? Did they come to you and say: "Give us a rough estimate?" or was this a legitimate bid where your technical consultants sat down and determined how much work might be involved and they said: "We can do the job for $9.8 million."

Mr. BOCK. It was merely a ballpark estimate. That is essentially what was requested of us.

Mr. LEVITAS. If the gentleman will yield.

The one thing we're glossing over is that $9.8 million bid, according to your testimony, Mr. Diver, was made in the early part of 1982 at a time when there was this larger group of generators, who

we call the "Bayh group," who were considering a voluntary cleanup at Seymour. The word "surface," by the way, does not appear there.

So my question is: No. 1, what was the scope of the work you were asked to do—that's the first thing. What were you responding to. Was it confined to surface cleanup from the very beginning, because I think that's significant since we never got to this concept of two phases or two stages or anything till much later on. And yet, you've already indicated in your answers to Mr. Molinari's question that the $9.8 milliion, when it got finally—and then that last figure, $7.6 million—that the $7.6 was really a takeoff on the $9.8.

So I'm curious to know such things as: What were you asked to bid on in the early part of 1982? Did it cover surface and subsurface? Or was it just generally said: "What would it cost to remove the drums and stuff up there on top." Or were you being asked to bid on the cleanup. What studies did you have available? Did you have studies, consultants' reports, government information, and therefore, what was your ballpark figure responding to?

Because, I think if we don't understand that, we are not going to understand how you get to the $7.6—or how you get $7.6 at the end of the line.

Mr. BOCK. First of all, initially, we were asked to respond solely to a surface cleanup. By the time we were requested to provide any information, pricing information, apparently that decision had been made—that the only thing we would be responding to was surface cleanup.

Mr. LEVITAS. That's originally in 1982 back in January?

Mr. BOCK. Correct.

Mr. LEVITAS. OK.

Mr. BOCK. And with regard to the scope of work, again, there was not a detailed scope of work other than to give an approximate number of drums that were on the site—the approximate number of tanks that were on the site. I believe the initial scope of work also included demolition of some buildings that were on the site.

Mr. LEVITAS. How many drums were we talking about?

Mr. BOCK. We were told, initially, 60,000 drums on the site.

Mr. LEVITAS. And that's what you based your ballpark figure on?

Mr. BOCK. Right; we based our ballpark figure on 60,000 drums. With respect to the amount of reports and data that was available, there was almost nothing in existence. The only information I can recall having at all was the report on the general types of materials that were found at the facility during the emergency action in 1980.

Mr. LEVITAS. OK. To make sure I've got it straight, and if you want to correct me, please do so—you were contacted by whom in 1982?

Mr. BOCK. We were contacted by IBM Corp.

Mr. LEVITAS. Well, was there a person who did it, or was it one of their computers?

Mr. BOCK. Our first contact would be either Mr. Bob Morris or Mr. Scott Richter—I'm not sure which one of those contacted us initially.

Mr. LEVITAS. And they said that they were with a group of generators at Seymour who were thinking about a voluntary cleanup

and would you give them your estimate of what you would do a surface cleanup for at that site?

Mr. BOCK. Essentially that is correct.

Mr. LEVITAS. All right.

Mr. MOLINARI. The $9.8 million figure is predicated upon, you just said, 60,000 barrels. When you came up with the final figure of $7,644,000, what was the number of actual barrels that you anticipated would be removed.

Mr. BOCK. After we had the opportunity to go on the facility and examine it much more closely and in much more detail in order to prepare a proposal, it was our feeling that there were less that 60,000 drums on the site. However, I believe in our calculations we did utilize that 60,000 drum number in order to provide a contingency or a buffer, if you will.

Mr. MOLINARI. How many barrels did you actually remove from the site?

Mr. BOCK. I believe the number is somewhere around 45,000 which were actually onsite.

Mr. MOLINARI. Any idea what the difference in saving was because of the 15,000 barrels?

Mr. BOCK. I don't have any idea what that savings would be.

Mr. MOLINARI. Now, just one or two last questions and I'll yield back to the chairman for questions.

When you had the second bid submitted, were the original competitors asked to submit bids and did they, in fact, submit bids at the time you submitted your $7.6 million?

Mr. BOCK. I believe the progression was essentially this: Early in the year, I believe around April or May, when the three companies were requested to put together some ballpark numbers for surface cleanup, I believe at that point the generating group or the PRP group had some discussions on what was presented. For reasons as Mr. Diver went through in his testimony, we believe that they selected us. One reason being, of course, that we had the lowest price. I believe we had the most technically competent approach to the project

Mr. MOLINARI. Excuse me. The lowest price what?

Mr. BOCK. The lowest ballpark figure at that point in time for a surface cleanup effort.

Mr. MOLINARI. What difference does that matter. Whether it's a ballpark figure, it wasn't a figure that they were going to pay. It was the finalized figure that after total computation they were going to pay. And I don't see why they should—and maybe I'm missing something—but because you've got three corporations coming in with ballpark figure if one company comes in with a lower ballpark figure, do we forget the other two and say: "OK, now give me your final price and you've got the job because you were the one that came in with the lowest figure when we were looking for ballpark."

Mr. BOCK. Sure. Sure. I can't possibly explain to you what their ultimate rationale was. That would be a question, obviously, they would have.

Mr. MOLINARI. Unless they have indicated to you why.

Mr. BOCK. Essentially they came back to us and indicated that we would be the selected contractor. And that we should begin pre-

paring and looking at the facility more closely and begin preparing a more detailed cleanup plan. The basis for their decision—obviously I was not in that room when that decision was made by that group.

Mr. MOLINARI. I think someplace in the testimony of Mr. Diver he alluded to at least some of the reasons why you were selected. I remember him talking about the "Based on the previous low bid." Which I find somewhat remarkable. I don't know what that has to do with the actual low bid. Then you talk about business experience, and that was certainly a very valuable point and your permitted sites and facilities would obviously be of very deep concern to them.

So there is some testimony here indicating the reasons that they gave for selecting you.

Mr. BOCK. Essentially, what I am saying, is that we feel those are the reasons why they selected us as the contractor. As far as them coming back to me and saying directly why they selected us as the contractor and list a series of reasons why, I can't recall them every having done that in those terms. We were certainly pleased with the fact that they did come back to us and indicate we were the selected contractor. At that point, you don't want to question their reasoning.

Mr. MOLINARI. I understand. And the question comes to my mind and I'll pass on to the chairman after this, you came up with a figure of $9.8 million which was the same figure that your business submitted. What would change? You were still the low bidder; you still had the same permitted sites; you still had the good business experience. And they had no reason to believe that you were going to come in with a lower figure because at that point you were still planning on 60,000 barrels of removal. You might have done yourself out of a couple of million dollars here.

Mr. BOCK. That's quite possible. However, we feel that the proposal that we submitted was fair and equitable to ourselves as well as to the generator group.

Mr. MOLINARI. Mr. Chairman, I'll pass back to you.

Mr. LEVITAS. Let me just pick up right there. It is also a factor, isn't it, that you had done work for IBM at this site in 1980?

Mr. BOCK. Yes; that's correct.

Mr. LEVITAS. And they had experience with you. They were satisfied with what you did.

Mr. BOCK. Yes.

Mr. LEVITAS. Were you under contract in 1982 with IBM to do work with them at any other site?

Mr. BOCK. As far as any other site referencing a cleanup facility, I can't really recall. I believe we did not on a public-type facility, but rather on one of their facilities, I believe we may have done some work.

Mr. LEVITAS. What about any consulting work for them—advising, counseling?

Mr. BOCK. No; that is really not a part of the business.

Mr. LEVITAS. Well, in the middle of the summer in 1982, when you were coming up and refining your original ballpark figure, and ultimately came up with the $7.6, what additional studies or re-

ports or information did you have that were not available to you earlier?

Mr. BOCK. As I recall, there was really very little information. We did get some additional information, the specifics of which I don't recall at this point, but there was some additional information that, as I recall, was not really that helpful to us. But EPA had done some work; I believe a consultant for IBM had done some work; and we were made privy to that information. But as I recall, on balance, it was not very useful to us.

Mr. LEVITAS. So, essentially, you did not have a great deal more information in the middle of the summer than that that you had available at the beginning of the year.

Mr. BOCK. Essentially that is correct.

Mr. LEVITAS. Now, I understand there have been conversations and discussions between yourselves and our professional staff concerning some information that we need.

Mr. BOCK. Correct.

Mr. LEVITAS. Specifically, I am referring to a detailed cost breakdown of the estimated and final cost of the cleanup broken down by 14 categories in the scope of the work and adjusted, as necessary, to reflect any changes in the scope that occurred. We understand that you regard this as proprietary information. Therefore, I am prepared at this point to accept that information being provided us by letter which will not, at this time, be made a part of the record. So that it can be treated in the way that you've indicated as proprietary information but we find it essential for our purposes in evaluating what you have done compared to what EPA may do in the future and what they have done in the past.

Mr. BOCK. We will certainly respond. And we appreciate that consideration, Mr. Chairman.

Mr. LEVITAS. Now, you say that, I think Mr. Molinari already touched on this, that the $7.6 million which does not appear in the consent decree was actually a negotiated figure with Mr. Topol and his group.

Mr. BOCK. Actually, the $7.6, $7.7 million figure was not really that negotiated a figure. Certainly there was some questioning throughout the development of the technical proposal with the technical committee of the generating group with respect to the cost that would be associated and what our cost might be. There was some negotiating on that, but the degree of which I do not feel is unusual in any kind of business transaction.

Mr. LEVITAS. When did you finally determine what the contract price would be?

Mr. BOCK. I believe the final contract number was finally reached about a week before the consent decree was actually submitted. So it was very, very late in the process that the final number was determined.

Mr. LEVITAS. All right. Now on page 4, Mr. Diver, of your testimony there are two things which I think Mr. Molinari touched on, but I am not sure that I really understand. At page 4 you say: "As further insurance that cleanup would conform to the consent decree, Chemical Waste Management signed the consent agreement independently and became a party to that agreement." I understand that. Mr. Topol testified yesterday that that was done to

make sure what you did was covered by the court. The court could sort of supervise it. That was independent, as I read your testimony, was separate from the fact that an affiliated corporation was also a potentially responsble party.

Mr. DIVER. Correct.

Mr. LEVITAS. You then say, the next paragraph: "The involvement of Chemical Waste Management in the Seymour cleanup was complicated by the inclusion of that affiliated company." Now, I don't understand what the complication was.

Mr. DIVER. The complication was, perhaps——

Mr. LEVITAS. It seemed more like an opportunity.

Mr. DIVER. The complication is with respect to this committee's inquiry. I suspect that the presence of Waste Resources of Tennessee has occupied some of the attention of this committee and others. And it has been, because of that, a complication.

For us it wasn't a complication—I mean, Waste Resources was there, there was nothing you could do about it. And Chemical Waste Management was trying to get the contract and there was nothing we could do about that. It was not a complication, per se.

I believe you will note on the amended complaint, which was filed on October 26 contemporaneous with the submission to the court of the consent agreement, Chemical Waste Management, Inc., was not a named defendant. But Waste Resources of Tennessee, Inc., was a named defendant shown as an affiliate of Chemical Waste Management, Inc. And that's the only connection that Chemical Waste has as a party. And that, I suspect, gave some solace to some one or more lawyers for the Department of Justice or EPA that Chemical Waste Management, being bound by this decree, there was some consideration in the fact that Chemical Waste Management was an affiliate of one of the settling parties. Absent that, I suppose one might have argued: Wait a minute, USEPA, you're giving us nothing and consequently we aren't bound under this agreement. So that gave some comfort, I think, to the parties.

Mr. LEVITAS. What I'm trying to understand at this point is not so much what occurred, but your statement. On page 4, which I just read from, Waste Resources were a complicating factor. But on the next page, you agree to the position that Chemical Waste's legal position would be improved by the inclusion of Waste Resources as a party to the consent decree. So you go from a complication to an improvement in one page. I don't understand.

Mr. DIVER. I'm trying to explain it. It was not a complication to Chem Waste. I would say this written statement probably misspeaks the fact because it seems to indicate that at that time it was a complication. It was not a complication at that time. It has become a complicating factor in that now there are two affiliated companies, each of which has an independent relationship, but obviously an associated relationship that have been the subject of inquiry—we think unnecessarily, but obviously that's neither here nor there.

Mr. LEVITAS. I understand what you are saying now. Mr. Molinari makes the point, or suggests that there were some other corporations who had a better claim and a higher "right," in quotation marks, to be included in the Topol/IBM group as part of the

$100,000 club than did Waste Resources, your affiliate. And there is the suggestion that perhaps you got favored treatment because of your relationship with IBM and the Topol group when Stewart-Warner, for example, or Alcoa, got passed over to get down to Waste Management. You're response to that is, "That may or may not be true, but we don't know anything about it."

Mr. DIVER. We don't know anything about that and it would have been in the period late June 1982 when counsel for Waste Management, Inc., became aware of the fact that Waste Resources of Tennessee was a potentially responsible party. And I believe at that point in time in the discussion, albeit WRT, Waste Resources of Tennessee was not a party that would actively be involved in doing the negotiations. I think it was understood at that point in time that they were interested in becoming part of this group.

Mr. LEVITAS. Another part of your statement that I have trouble with, because I'm sure you're not naive, but it reads as if you are, or your company is, is where you said that you wanted to buy into the settlement for whatever benefit might flow from it. Whatever those benefits were. And then, as fate would have it, you made a good deal or a bad deal—I guess we don't know yet—because even though you paid $100,000 and your liability on a pro rata basis would only have been——

Mr. DIVER. $19,000.

Mr. LEVITAS [continuing]. $19,000, OK. But lo and behold, you got a release from all further liability, contingent liability at the end of the line as far as being one of the settling parties. But you really didn't know that until it happened.

Now, it is my understanding, Mr. Diver, that it was bedrock as far as Mr. Topol's negotiating position with EPA was concerned, that there was going to be a release from all contingent liability and subsurface liability, or else there was not going to be anything. From the very beginning that that was sort of, "We'll talk about—We're not interested in the amount of money." In fact he said yesterday, he said, "We are not concerned about how much it will cost. That will take care of itself. Here are the things that we are concerned about." And that from the outset, if that group was going to settle, they would only settle with a release from liability.

So therefore, I don't understand why Chemical Waste, who was participating as part of that group, or whatever company was participating, did not expect that there would be an exemption from the liability if there was a settlement made at all. That is, it wasn't just one of those sort of happy results that came at the end of the line.

Mr. DIVER. I think that Chemical Waste Management knew the negotiating posture that the chairman of this group and counsel were taking with regard to the USEPA. But negotiating postures, being just that, when you get down to having to tighten the bolts on a consent agreement and somebody says, "No. I can't do it if that is going to stay in" the postures can change. And as part of the entire negotiating process, there is a possibility at all times that it can change up to the very last minute. And at that time that Waste Resources agreed without knowing what sums would be talked about to be a party to this group. Now obviously when a

number was finally talked about, there had to be consideration given to whether to continue participation.

At that point in time we too just had this position in the generator group. Obviously, not controlling the generator group, we couldn't tell whether or not that was something the EPA was going to ultimately agree to or not.

Mr. LEVITAS. I understand that you don't know what it is going to be, but I think—isn't it fair to say that the negotiating posture of Mr. Topol was that the reason we are talking is that we want to get released from further liability for subsurface and its potential liability and that's why we are here. And everybody who was part of that group knew this.

Mr. DIVER. Yes. I don't think there was a lot of doubt about that.

Mr. LEVITAS. Now, let me—I've got one last point to clarify in your statement and it may be the one that troubles me the most, and that has to do with the misdirected shipment that met with an unexpected mishap on the way in the wrong direction.

I've heard your testimony, and I've read it several times, but my question is: Why was that shipment going to the site at——

Mr. DIVER. Evergreen.

Mr. LEVITAS [continuing]. Evergreen?

Mr. DIVER. I'll ask Ray, again, to fill us out in just a minute, but it involved the facilities that had been identified in the work plan. It became apparent that a number of those facilities were only to be capable of utilization by fighting through a barrage of community opposition. And the company made the determination not to fight through the barrage because we were talking about having the contract that we were bound temporarily to a finite term to complete, rather than to fight to try to solve the problem.

The company felt that it was not bound to those particular named facilities because, as I indicated, it was intended only to be an illustrative list. But that as long as the waste could go to one, a permitted facility that was owned by Chemical Waste Management or a Chemical Waste Management affiliate owned and operated by Waste Management, that that was within the intent of that agreement.

Mr. LEVITAS. I'll get back to that aspect of it. What I want to know is: What was the reason it was going to Evergreen? Is it because, as you've indicated, that the places that you listed in the work plan were going to create some community problems so you wanted to ship them in the other direction, to Evergreen, in order to avoid that. Is that—is there any other reason?

Mr. BOCK. That is certainly a part of the reason. The fact that some of the facilities that we listed as soon as it got in the newspaper that we were going to be cleaning up Seymour, immediately people organized and said: "Don't bring that Seymour waste here." I'm sure you recognize that "not next to me" syndrome that has been talked about for a long time.

At any rate, the Evergreen facility was additionally in proximity of a relatively close facility to the Seymour facility. It was permitted, as Jeff has indicated, to accept the waste. And it was, in fact, owned and operated by Waste Management.

Mr. LEVITAS. Do you have a copy of the shipping manifest of that particular shipment?

Mr. BOCK. I don't believe we have it here. However we have copies of every shipment of waste material.

Mr. LEVITAS. Would you furnish that for the record, please?

Mr. BOCK. Just that single one, or all of the manifests.

Mr. LEVITAS. Well, I don't know how many there are.

All of those that went to Evergreen. I want this one and all of those that went to Evergreen.

Mr. BOCK. OK. Fine. We can provide that.

Mr. LEVITAS. Or to any other site that was not specified on the work plan.

Mr. BOCK. Certainly.

[Information received from Mr. Bock follows:]

(1)

	DATE	MANIFEST NUMBER	CRUSHED DRUMS	SLUDGE	SCRAP	FLAMMABLE LIQUID	INERT LIQUID	EMPTY TANKS	SOLID DRUMS	DISPOSAL SITE
	12-20	58 200						58		AL
	12-20	58 201						34		AL
	12-20	58 202						32		AL
	12-21	58 203						47		AL
	12-22	58 204						47		AL
	12-22	58 205						25		AL
	12-27	58 206						58		AL
	12-28	58 207						58		AL
	12-28	58 208						55		AL
	12-28	58 209						26		AL
	12-28	58 210						29		AL
	1-4	58 211						13		AL
	1-4	58 212						58		AL
	1-4	58 213						47		AL
	1-7	10 001 ✓			20					EV
	1-11	10 002 ✓		20						EV
	1-11	10 003 ✓		20						EV
	1-12	10 004 ✓		20						EV
	1-12	10 005 ✓		20						EV
	1-13	10 006 ✓		20						EV
	1-13	10 007 ✓		20						EV
	1-14	10 008 ✓		20						EV
	1-14	10 009 ✓		20						EV
	1-17	10 010 ✓		20						EV
	1-17	10 011 ✓		20						EV
	1-17	10 012 ✓		20						EV
	1-17	10 013 ✓							58	EV
	1-18	10 014 ✓		20						EV
	1-18	10 015 ✓		20						EV
	1-18	10 016 ✓	20							EV
	1-18	10 017 ✓		20						EV
	1-18	10 018 ✓	20							EV
	1-18	10 019 ✓	20							EV
	1-19	10 020 ✓							76	EV
	1-19	10 021 ✓		20						EV
	1-19	10 022 ✓		20						EV
	1-19	[illegible] ✓	30							EV
	1-19	[illegible] ✓	20							EV
	1-19	[illegible] ✓	20							EV
	1-19	[illegible] ✓			20					EV
11		SUB-TOTAL	120	320	40		2	582	134	
12										
13		TOTAL	120	320	40			582	134	

(2)

	DATE	MANIFEST NUMBER	CRUSHED DRUMS	SLUDGE	SCRAP	FLAMMABLE LIQUID	INERT LIQUID	EMPTY TANKS	SOLIDS DRUMS	DISPOSAL SITE
1	1/20	10 026		20						EV
2	1/20	10 028		20						EV
3	1/20	10 029	20							EV
4	1/20	10 030	20							EV
5	1/20	10 031	20						76	EV
6	1/20	10 032								EV
7	1/21	10 033	20							EV
8	1/21	10 034	20							EV
9	1/21	10 035	20							EV
10	1/21	10 036		20						EV
11	1/24	10 037	20							EV
12	1/24	10 038	20							EV
13	1/24	10 039	20							EV
14	1/26	10 040	20							EV
15	1/26	10 041	20							EV
16	1/26	10 042	20							EV
17	1/25	10 043			20		5 500			CD
18	1/25	10 044								EV
19	1/26	10 045	20				5 500			CD
20	1/26	10 046					5 000			CD
21	1/26	10 047								SEE
22	1/26	10 048				5 500				SEE
23	1/26	10 049				5 500				EV
24	1/27	10 050	20							EV
25	1/27	10 051	20							EV
26	1/27	10 052	20							EV
27	1/27	10 053	20							CV
28	1/27	10 054				5 500				SEE
29	1/28	10 055	20							EV
30	1/28	10 056	20							EV
31	1/28	10 057	20							EV
32	1/28	10 058	20							EV
33	2/1	10 059	20							EV
34	2/1	10 060	20							EV
35	2/1	10 [illegible]	20							EV
36	2/2	10 [illegible]	20							EV
37	2/2	10 [illegible]	20							EV
38	2/2	10 [illegible]	20							EV
39	2/2	[illegible]			20				76	[illegible]
40	2/2	[illegible]								[illegible]
41		SUB-TOTAL	540		60	40	16 500		152	
42										
43		TOTAL	660		380	80	16 500		382	228

(2)

DATE	MANIFEST NUMBER	CRUSHED DRUMS	SLUDGE	SCRAP	FLAMMABLE LIQUID	INERT LIQUID	EMPTY TANKS	SOLIDS DRUMS	DISPOSAL SITE
2/3 1	10 067	20							EK
2/3 2	10 068	30							EK
2/5 3	10 069	20						68	EK
2/3 4	10 070								EK
2/4 5	10 071	20							EK
2/4 6	10 072	20							EK
2/4 7	10 073	20							EK
2/7 8	10 074	20							EK
2/7 9	10 075	20							EK
2/7 10	10 076	20							EK
2/8 11	10 077	20							EK
2/8 12	10 078	20							EK
2/8 13	10 079	40							EK
2/9 14	10 080	20							EK
2/9 15	10 081	20							EK
2/9 16	10 082	20				5 000			OLD
2/9 17	10 083					5 000			OLD
2/9 18	10 084								EK
2/10 19	10 085	20							EK
2/10 20	10 086	20							EK
2/10 21	10 087	20				5 000			OLD
2/10 22	10 088								EK
2/11 23	10 089	20							EK
2/11 24	10 090	20							EK
2/11 25	10 091	20							EK
2/15 26	10 092	20							EK
2/15 27	10 093	40							EK
2/15 28	10 094	20							EK
2/15 29	10 095			20					AL
2/15 30	58 214				5 000				EK
2/10 31	10 096	20							EK
2/16 32	10 097	20							EK
2/16 33	10 098	20							EK
2/16 34	10 099	20							EK
2/16 35	58 215				5 000				AL
2/16 36	58 216				5 000				AL
2/17 37	10 100	20							EK
2/17 38	10 101	20							EK
2/17 39	10 102	20							EK
2/17 40	10 103	20							EK
41	SUB-TOTAL	640		20	15 000	13 000		68	
42									
43	TOTAL	1 300		40	30 31 500	31 000		382	382

(4)

	DATE	MANIFEST NUMBER	CRUSHED DRUMS	SLUDGE	SCRAP	FLAMMABLE LIQUID	INERT LIQUID	EMPTY TANKS	SOLIDS DRUMS	DISPOSAL SITE
1	2/18	10 1047	20							EVER
2	2/18	10 1057	20							EVER
3	2/18	10 1067	20							EVER
4	2/18	10 1077	20							EVER
5	2/21	10 1087	20							EVER
6	2/21	10 1097	20							EVER
7	2/21	X 10 110	✓ 20		Nitrate					EVER
8	2/21	10 111	20							EVER
9	2/21	10 112	20							EVER
10	2/21	10 113	20							EVER
11	2/21	10 114					5 000			OLD
12	2/21	10 115					5 000			OLD
13	2/22	10 116	20							EVER
14	2/22	10 117	20							EVER
15	2/22	10 118	20							EVER
16	2/22	10 119	20							EVER
17	2/22	10 120	20							EVER
18	2/22	10 121	20							EVER
19	2/22	10 122					5 500			OLD
20	2/23	10 123	20							EVER
21	2/23	10 124	20							EVER
22	2/23	10 125	20							EVER
23	2/23	10 126	20							EVER
24	2/23	10 127	20							EVER
25	2/23	58 217				5 000				AL
26	2/24	58 218				5 000				AL
27	2/24	58 219	20							AL
28	2/24	58 220	20							AL
29	2/24	58 221	20							AL
30	2/24	58 222	20							AL
31	2/24	58 223	20							AL
32	2/24	58 224	20							AL
33	2/24	58 225				5 500				AL
34	3/1	58 226	20							AL
35	3/1	58 227	20							AL
36	3/1	58 228	20							AL
37	3/1	58 229	20							AL
38	3/1	58 236				5 000				AL
39	3/1	58 237				5 000				AL
40	3/2	10 128					5 500			OLD
41		SUB-TOTAL	620			73 500	21 000			
42										
		TOTAL		400	80	67 000	52 000	582	394	

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

also sent schedule mailed 2-3-83

10049
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

JUSTAK BROS
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	10 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED (MO. DAY YR.)
GENERATOR/ SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-26-83
TRANSPORTER # 1	IND000780320	JUSTAK BROS. - 610 131 PL. - HAMMOND, IND. 46320 (219) 933-4600	1-26-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD093945293	SOLVENT RESOURCE RECOVERY - 4301 DEFIANCE RD - WEST CARROLLTON, OH 45449 (513) 859-6101	
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 TANKER		D001	WASTE Flammable Liquid, N.O.S.	UN 1993				5500 gals.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged, creating a serious situation, call shipper's telephone number or Chemtrec 1-800 424 9300, immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $

per

All the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

COD FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

(FREIGHT PREPAID) except when box is checked ☐

Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 1-26-83
GENERATOR'S SIGNATURE DATE

3CTD167

This is to certify acceptance of the hazardous waste shipment.

Ben C Compton 1/27/83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

John Kuchmier 1-27-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10048
MANIFEST DOCUMENT NUMBER

aroon steel wheeled
mailed 2-3-83

JUSTAK BROS.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040513017	CHEMICAL WASTE MGMT. - 150 W. 137TH ST. RIVERDALE IL 60627 (312) 841-9600	1-26-83
TRANSPORTER # 1	IND000780320	JUSTAK BROS - 610 131 PL HAMMOND, IND 46320 (219) 938-4600	1-26-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD093945293	SOLVENT RESOURCE RECOVERY - 4301 INFIRMARY RD. WEST CARROLLTON, OH 45449 (513) 859-6101	1-26-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 TANKER		D001	WASTE FLAMMABLE LIQUID, N.O.S.	UN1993				5500 GAL		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (except when box at right is checked) ☐
Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartman 1-26-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Roy C. Cooper 1/26/83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

Tom Buchanan 1-26-83
TSDF SIGNATURE DATE

STYLE F-90 © LABELMASTER CHICAGO, IL 60620

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

attn Scott Schedler
mail 2388

10054
MANIFEST DOCUMENT NUMBER

JUSTAK BROS
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED BY SHIPPER
GENERATOR/SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W. 137 th ST. - RIVERDALE, IL 60827 (312) 841-8600	1-27-83
TRANSPORTER # 1	IND000780320	JUSTAK BROS 610 131 St. - HAMMOND, IND 46320 (219) 933-4600	1-27-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD093945293	SOLVENT RESOURCE RECOVERY - 4301 Infirmary RD - West Carrollton, OH (513) 859-6101 45449	
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR RQ LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	DISCHARGES (For Carrier Use Only)
1 TANKER		D001	WASTE FLAMMABLE LIQUID, N.O.S.	UN1993				5500gal.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (collect). If other DOT Hazardous Materials are discharged greater than a serious violation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

FREIGHT COD TO ADDRESS

COD Amt. $

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID except when box at left is checked
Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 1/27/83
GENERATOR'S SIGNATURE DATE

236070

This is to certify acceptance of the hazardous waste shipment.

Roy E Cooper 1/27/83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

Tony Rose 1-27-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL — NOT NEGOTIABLE

10001
MANIFEST DOCUMENT NUMBER

16480
SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT INC (SEYMOUR) (SCAC)
NAME OF CARRIER

1128
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W. 137TH ST. - RIVERDALE, IL 60827 (312) 841-8600	1-7-83
TRANSPORTER # 1	OHD018034595	CHEMICAL WASTE MGMT. - 304 LIBERTY ST. FREMONT, OH 43420 (419) 332-2698	1-7-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT/STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD. NORTHWOOD, OH 43619 (419) 666-5136	1-10-83
TSDF TREATMENT/STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.260)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 ROLL-OFF			HAZARDOUS WASTE SOLID, NOS, SCRAP METAL	NA 9189	—			20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt: $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Tom Hartford 1-7-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.
TRANSPORTER #1 SIGNATURE & DATE: [redacted]
This is to certify acceptance of the hazardous waste for treatment, storage or disposal.
[redacted] 1-10-83
TSDF SIGNATURE DATE

STYLE F-80 © LABELMASTER CHICAGO, IL 60630

HAZARDOUS WASTE MANIFEST

10002
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED ON RECEIVED
GENERATOR SHIPPER	IND 740 213 017	CHEMICAL WASTE MGMT - 150 W. 137TH ST. RIVERDALE, IL 60627 (312) 841-8600	1-11-83
TRANSPORTER # 1	ILD000202624	Chemical Waste Mgmt - 4500 W 103rd ST - Alsip IL (312) 396-1060	1-11 83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OH0 048 111 227	EVERGREEN LANDFILL - 6525 WALES RD NORTHWOOD, OH 43619 (419) 666-9136	1-11-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE NO. #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	WASTE STREAM	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		WWLS WOO	HAZARDOUS WASTE SOLID, NOS Contains Oil - Manifested and Correct number if known	NA 9189	-			20yds		

SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steve Hartland
GENERATOR'S SIGNATURE

1-11-83
DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE

DATE

5

STYLE F 90 © LABELMASTER CHICAGO IL 60626

HAZARDOUS WASTE MANIFEST

1000 8
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	ILD 7410 13017	CHEMICAL WASTE MGMT. 150 W. 137 ST. RIVERDALE IL 60827 (312) 841 8650	1-11-83
TRANSPORTER # 1	ILD 000706604	CHEMICAL WASTE MGMT - 4602 W 123RD ST. - ALSIP, IL (217) 546-1060	1-11-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD 988 111 327	EVERGREEN LANDFILL 6525 JACKS RD - NORTHWOOD, OH (419) 666 5126	1-11-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR RQ LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		WHSE	HAZARDOUS WASTE SOLID, NOS	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a roadway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT hazardous materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. I.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(Freight Prepaid) except when box at right is checked
Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — 1-11-83 DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — 1-11-83

TRANSPORTER #2 SIGNATURE & DATE OF required

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE 1-13-83

5

STYLE F 50 LABELMASTER CHICAGO IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10004
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	ILD040313019	Chemical Waste Mgmt. - 150 W. 137th ST. - RIVERDALE, IL. 60627 (312) 841-8600	1-12-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Mgmt. - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-12-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen LANDFILL - 6525 Wales Rd. - Northwood, OH 43619 (419) 666-5136	1-12-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (80 °C) WHEN REQ'D	WHTS W/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DMP TAILER		D008	Hazardous Waste Solid, N.O.S.	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged, creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gaertner 1-12-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. DeRoberts 1-12-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10005
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Mgmt. - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-6200	1-12-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Mgmt. - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-12-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill - 6525 Wiles Rd - NORTHWOOD, OH 43614 (419) 666-9736	1-12-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, N.O.S.	NA 9187				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

PREPAID: Check box if charges are to be prepaid.
COLLECT: Check box if charges are to be collected.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 1-12-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER'S SIGNATURE & DATE

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D E Roberts 1-12-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10006
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	Chemical Waste Mgmt - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-9600	1-13-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Mgmt - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-13-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 NIMES RD - NORTHWOOD, OH 43614 (419) 666-5136	1-13-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, N.O.S.	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Notice—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. This agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

$ _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is 'carrier's or shipper's weight.'"

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is hereby agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartman — 1-13-83
GENERATOR'S SIGNATURE — DATE

This is to certify acceptance of the hazardous waste shipment.

Wayne Duff
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

K E Roberts — 1-13-83
TSDF SIGNATURE — DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10007
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	ILD040313017	Chemical Waste Mgmt - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-13-83
TRANSPORTER # 1	ILD000106604	Chemical Waste Mgmt - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-13-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD048111327	Evergreen Landfill - 6525 Wales Rd. - Northwood, OH 43614 (419) 666-5136	1-13-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C WHEN REQ'D)	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	Hazardous Waste Solid, N.O.S.	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (or 202-426-2675 from DC). If other DOT hazardous materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

If the shipments moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

Signature

Signature of Consignee

RECEIVED subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading. The property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bills of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Dave Martinez 1-13-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Gary Hoard 1-13-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

J. DeStefano 1-13-83
TSDF SIGNATURE DATE

STYLE F 501 © LABELMASTER CHICAGO IL 60625

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10008
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 EIGHT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	ILD040313017	Chemical Waste Mgmt.-150 W. 137th ST. - RIVERDALE, IL (312) 841-8600 60627	1-14-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Mgmt-4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-14-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill-6525 Wales Rd.-Northwood, OH 43614 (419) 666-5136	1-14-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		0008	HAZARDOUS WASTE SOLID, N.O.S.	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (not cash). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES (FREIGHT PREPAID / EXCEPT WHERE ENTERED BY GOV'T LIMITATIONS) Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

"If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 1-14-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Lon Anderson
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D E Robert 1-14-83
TSDF SIGNATURE DATE

STYLE P-90 © LABELMASTER CHICAGO IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10009
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC. (SCAC)
NAME OF CARRIER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	ILD004031307	Chemical Waste Mgmt. 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-9600	1-14-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Mgmt. - 4300 W. 138 rd ST. - Alsip, IL (312) 396-1060	1-14-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill - 6525 Wales Rd. - NORTHWOOD, OH 43614 (419) 666-5136	1-14-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, N.O.S.	NA 9189				20405		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labelled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gottlieb 1-14-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

[signature] 1-14-83
TRANSPORTER # 1 SIGNATURE & DATE

TRANSPORTER # 2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

[signature] 1-14-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10010
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	CHEMICAL WASTE MGMT.-150 W 137 ST.-RIVERDALE, IL 60627 (312) 841-8600	1-17-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT.-4300 W 123 rd. ST - ALSIP, IL (312) 396-1060	1-17-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL-6525 WALES RD -NORTHWOOD, OH 43619 (419) 666-5136	1-17-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, N.O.S.	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

FREIGHT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."
_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (Check box if charges are to be prepaid)
Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 1-17-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 1-17-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10011
MANIFEST DOCUMENT NUMBER

[redacted] WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	EPA ID NO.	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE TRANSPORTED
GENERATOR/SHIPPER	ILN0040313017	CHEMICAL WASTE MGMT. - 150 W. 137th ST. - RIVERDALE, IL 60827 (312) 841-8600	1-17-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT. - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-17-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111397	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43619 (419) 666-5136	1-17-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	[redacted]
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, NOS.	NA 9189				

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID) except when box at right is marked
Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

"If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is 'carrier's or shipper's weight.'"

$ _____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if required, the property described on the date of the issue of this Bill of Lading, [illegible] in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above, which carrier agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is understood that throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartzke — 1-17-83
GENERATOR'S SIGNATURE — DATE

This is to certify acceptance of the hazardous waste shipment.

[redacted] Vroom
TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts — 1-17-83
TSDF SIGNATURE — DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

V0012
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	ILD040313017	CHEMICAL WASTE MGMT. - 150 W 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-17-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT. - 4300 W 123rd ST. - ALSIP, IL (312) 396-1060	1-17-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43614 (419) 666-5130	1-17-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS / CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, N.O.S.	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

A

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

_____ Signature

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steve Stutland 1-17-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Ed Koehne 1-17-83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D E Roberts 1-17-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

1613
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CARRIER NUMBER

CHEMICAL WASTE MANAGEMENT, INC. (SCAC)
NAME OF CARRIER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	ILD040313017	CHEMICAL WASTE MGMT. - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-17-83
TRANSPORTER # 1	NJD000806604	CHEMICAL WASTE MGMT. - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-17-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111337	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43614 (419) 666-5136	1-17-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 FLAT-BED			17 - 55 gal dr. HAZARDOUS WASTE SOLID, N.O.S. ORM-E	NA9189				17-55 gal.		
			28 - 85 gal dr. HAZARDOUS WASTE SOLID, N.O.S. ORM-E	NA9189				28-85 gal.		
			13 - 85 gal dr. FLAMMABLE SOLID N.O.S.	UN1325				13-85 gal.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800 424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID except when box B or C is checked) ☐ Check box if charges are to be billed

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

*If this shipment moves between two ports by a carrier by water, the law requires that the BILL OF LADING shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described below in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartley — 1-17-83
GENERATOR'S SIGNATURE — DATE

This is to certify acceptance of the hazardous waste shipment.

Ken Lendvorsk — 1-17-83
TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

[illegible] — 1-18-83
TSDF SIGNATURE — DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10014
MANIFEST DOCUMENT NUMBER

0487009
SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	CHEMICAL WASTE MGMT-150 W 137th ST - RIVERDALE, IL 60627 (312) 841-8600	1-18-83
TRANSPORTER # 1	ILD000706604	CHEMICAL WASTE MGMT-4300 W. 123rd ST - ALSIP, IL (312) 396-1060	1-18-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL-6525 WALES RD - NORTHWOOD, OH 43614 (419) 666-5136	1-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID N.O.S.	NA9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID except when box of item 4 marked
Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under this contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 1-18-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 1-18-83

STYLE F-00 © LABELMASTER CHICAGO, IL 60621

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10015
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

1014
SHIPPER NUMBER
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040813017	CHEMICAL WASTE MGMT.-150 W. 137th ST. - RIVERDALE, IL (312) 841-8600 60627	1-18-83
TRANSPORTER # 1	IND000806604	CHEMICAL WASTE MGMT-4300 W 123rd ST. - ALSIP, IL (312) 396-1060	1-18-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH (419) 666-5136 43619	1-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, N.O.S.	NA1989				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where C.O.D. fee or dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____
Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____
Signature of Consignor

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (Check box if charges are to be collected) ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gerhard 1-18-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Brad Visser
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.

D E Kilbrook 1-18-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60526

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10016
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

1005
SHIPPER NUMBER
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	CHEMICAL WASTE MGMT - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-18-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-18-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD. - NORTHWOOD, OH 43619 (419) 666-5136	1-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ $ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

(FREIGHT PREPAID) EXCEPT WHEN BOX IS CHECKED ☐ Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Jane Lauten — 1-18-83
GENERATOR'S SIGNATURE — DATE

This is to certify acceptance of the hazardous waste shipment.

Ron Engley — _____
TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D E Roberts — 1-18-83
TSDF SIGNATURE — DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10017
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

1003
SHIPPER NUMBER
CARRIER NUMBER

IDENTIFICATION

	12 EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-18-83
TRANSPORTER # 1	ILD0608066O4	CHEMICAL WASTE MGMT. - 4300 W. 133rd ST. - ALSIP, IL (312) 396-1060	1-18-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111329	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43619 (419) 666-8136	1-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (38 °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, N.O.S.	UA9187				80 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID ☐ Check box if charges are to be collected

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland — 1-18-83
GENERATOR'S SIGNATURE — DATE

This is to certify acceptance of the hazardous waste shipment.

David G Bass
TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D E Roberts — 1-18-83
TSDF SIGNATURE — DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10018
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	ILD040313017	CHEMICAL WASTE MGMT. - 150 W. 137th ST. - RIVERDALE, IL 60827 (312) 841-8600	1-18-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT. - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1040	1-18-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43614 (419) 666-5136	1-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, NOS CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (except when box of gen. is checked)
Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ per

If the declared values between two parts by a carrier by water, the law requires that the bill of lading shall state whether it is "carriers or shipper's weight."

Signature

Subject to Section 7 of the conditions of this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the terms of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 1-18-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 1-18-83

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL — NOT NEGOTIABLE

10019
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MGMT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1019
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	CHEMICAL WASTE MGMT.-150 W. 137TH ST. RIVERDALE IL 60627 (312) 841-8600	1-18-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT-4300 W 123RD ST.-ALSIP, IL (312) 396-1000	1-18-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL-6525 WALES RD-NORTHWOOD,OH 43614 (419)666-5136	1-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE NO. #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 (800) 424-8802 (toll free) or 202 426 2675 (toll call). If other DOT hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 1-18-83

This is to certify acceptance of the hazardous waste shipment.

1-18-83 — TRANSPORTER #1 SIGNATURE & DATE

Ken DeBoer — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 1-18-83

STYLE F 50 © LABELMASTER CHICAGO IL 60626

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10020
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC (SCAC)
NAME OF CARRIER

SHIPPER NUMBER
1500
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR ACCEPTED
GENERATOR/SHIPPER	IND004313017	CHEMICAL WASTE MGMT - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-19-83
TRANSPORTER # 1	ILD000866604	CHEMICAL WASTE MGMT - 4300 W. 128th ST. - ALSIP, IL (312) 396-1060	1-19-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD. - NORTHWOOD, OH 43614 (419) 666-5136	1-19-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR RQ LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 VAN TRAILER			63-55 gal. dr. HAZARDOUS WASTE SOLID, N.O.S. ORM-E	NA9189				76-55 gal.		
			13-55 gal. dr. Flammable SOLID, N.O.S.	UN1325						

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. I

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is *carrier's or shipper's weight.

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (unless otherwise specified)
CHECK BOX if charges are to be collect ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 1-19-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE: 1-19-83

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 1-20-83

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10021
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1010
CARRIER NUMBER

IDENTIFICATION

	12 EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W 137TH ST. - RIVERDALE, IL 60627 (312) 841-8600	1-19-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT. - 4300 W 123rd ST - ALSIP, IL (312) 396-1060	1-19-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6535 WALES RD. - NORTHWOOD, OH 43619 (419) 666-5136	1-19-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR RQ LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, N.O.S	NA1189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID except when box at right is checked
Check box if charges are to be collect

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency

Gene Martin 1-19-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Ed Baker
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

L E Roberts 1-19-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10022
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1014
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W. 137th ST. RIVERDALE, IL 60627 (312) 841-8600	1-19-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT - 4300 W 123rd ST. - ALSIP, IL (312) 396-1060	1-19-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43614 (419) 666-9136	1-19-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE NO. #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, N.O.S.	NA9189				30 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES (FREIGHT PREPAID) Check box if charges are not to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartford 1-19-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Brad Varner
TRANSPORTER #1 SIGNATURE & DATE

_____
TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

V.E. Roberts 1-19-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10023
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
10091
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	ILD040313017	CHEMICAL WASTE MGMT.-150 W. 137th ST.-RIVERDALE, IL 60627 (312) 841-9600	1-19-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT.-4300 W. 123rd ST.-ALSIP, IL (312) 396-1060	1-19-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL-6525 WALES RD.-NORTHWOOD, OH 43614 (419) 666-5136	1-19-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH. POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

$ _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID) Except when box at right is checked
Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 1-19-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Steven R. Watson 1/19/83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

DE Roberts 1-19-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10024
MANIFEST DOCUMENT NUMBER

[redacted] CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1003
CARRIER NUMBER

IDENTIFICATION

	13 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-19-83
TRANSPORTER # 1	1600008064604	CHEMICAL WASTE MGMT. - 4300 W 123rd ST. - ALSIP, IL (312) 396-1060	1-19-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43614 (419) 666-5136	1-19-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call); if other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(Freight Prepaid except when box at right is checked)
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency

Gene Hartford 1-19-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment

David O'Brien
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal

R. E. Roberts 1-19-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10025
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1019
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	CHEMICAL WASTE MGMT.-150 W 137TH ST-RIVERDALE, IL 60627 (312) 841-8600	1-19-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT.-4300 W. 123rd ST.-ALSIP, IL (312) 396-1060	1-19-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL-6525 WALES RD-NORTHWOOD, OH 43614 (419) 666-5136	1-19-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 173.302, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that this bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID except when box at right is checked)
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland — 1-19-83
GENERATOR'S SIGNATURE — DATE

This is to certify acceptance of the hazardous waste shipment.

Ken DeBoer — 1-19-83
TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. E. Roberts — 1-19-83
TSDF SIGNATURE — DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

100 26
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR ACCEPTED
GENERATOR/ SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W 137th ST - RIVERDALE, IL 60627 (312) 841-8600	1-20-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-20-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43614 (419) 666-5136	1-20-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER		D008	HAZARDOUS WASTE SOLID, NOS.	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

Signature

(Signature of Consignor)

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property, over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Dave Hartland 1-20-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Dave Turner
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

[illegible] 1-20-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60826

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10027
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1128
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W 137TH ST. - RIVERDALE, IL 60627 (312) 841-8100	1-19-83
TRANSPORTER # 1	OHD018034595	CHEMICAL WASTE MGMT. - 504 LIBERTY ST. - FREMONT, OH 43420 (419) 332-2688	1-19-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43619 (419) 666-5136	1-20-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (deg. F) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGE TO (For Car for Use Only)
1 ROLL-OFF			HAZARDOUS WASTE SOLID, N.O.S. SCRAP METAL	NA9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

RESET C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

*If this shipment moves between two ports by a carrier by water, the law requires that this bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (Check box if charges are to be collected)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartman 1-19-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.
D E Roberts 1-20-83
TSDF SIGNATURE DATE

STYLE F 90 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10028
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040380017	CHEMICAL WASTE MGMT-150 W. 137th ST-RIVERDALE, IL 60627 (312) 841-3600	1-20-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT.-4300 W 123rd ST-ALSIP, IL (312)396-1060	1-20-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068411327	EVERGREEN LANDFILL-6525 WALES RD-NORTHWOOD, OH 43614 (419)666-3136	1-20-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 Dump Trailer		D008	HAZARDOUS WASTE SOLID N.O.S.	NA9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining, and the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
Check box – charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

"If this shipment involves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is 'carrier's or shipper's weight.'"

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — 1-20-83 DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — 1-20-83 DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

12029
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	ILD040313017	CHEMICAL WASTE MGMT-150 W. 137TH ST.-RIVERDALE, IL (312) 841-8600 60627	1-20-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT-4300 W. 123RD ST.-ALSIP, IL (312) 396-1060	1-20-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL-6525 WALES RD-NORTH JACKSON OH 44514 (419) 666-5136	1-20-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the Bill of Lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID) Check box if charges are to be collected ☐
Enter when box at right is checked

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gaetano 1-20-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

David A Bass
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

L E Roberts 1-20-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10030
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT. 150 W 137TH ST - RIVERDALE, IL 60627 (312) 841-7600	1-20-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT-4300 W 123RD ST. - ALSIP, IL (312) 396-1060	1-20-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111927	EVERGREEN LANDFILL-6525 WALES RD - NORTHWOOD, OH 43619 (419) 666-5136	1-20-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

RE/ST C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID except when box at right is marked
Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

"If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if required, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — 1-20-83 DATE

This is to certify acceptance of the hazardous waste shipment.

Ken DeMia 1-20-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Lobert — 1-20-83
TSDF SIGNATURE — DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60638

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10031
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

1009
SHIPPER NUMBER
CARRIER NUMBER

IDENTIFICATION

	13 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	CHEMICAL WASTE MGMT.-150 N 137th ST.-RIVERDALE, IL 60627 (312)891-3600	1-20-83
TRANSPORTER # 1	ILD000806684	CHEMICAL WASTE MGMT.-4300 W 137th ST.-ALSIP, IL (312)596-1060	1-20-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL-6525 WALES RD.-NORTH ROYALTON OH 44147 (419)666-3136	1-20-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ WASTE NO #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID EXCEPT WHEN BOX IS CHECKED)
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — 1-20-83 DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — 1-20-83 DATE

STYLE F 90 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10032
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

1500
SHIPPER NUMBER
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT. 150 W. 137TH ST. - RIVERDALE, IL 60627 (312) 841-8600	1-20-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT - 4300 W. 123RD ST ALSIP, IL (312) 396-1060	1-20-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6535 NARES RD - NORTHWOOD, OH 43614 (419) 666-5136	1-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 VAN TRAILER		[redacted]	53-55gal dr. HAZARDOUS WASTE SOLID, N.O.S., ORM-E	NA9189				76-55gal		
		D001	23-55gal dr. Flammable Solid, N.O.S.	UN1325						

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

COD Amt $

Subject to Section 7 of the conditions of this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steve Lenhard 1-20-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment

Ken Sendrick 1-20-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. C. Roberts 1-21-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60614

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10033
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1003
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	CHEMICAL WASTE MGMT-150 W 137th ST-RIVERDALE, IL 60627 (312) 841-8600	1-21-83
TRANSPORTER # 1	1400080660 4	CHEMICAL WASTE MGMT-4300 W 123rd ST. - ALSIP, IL (312) 396-1060	1-21-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL-6525 WALES RD.-NORTHWOOD, OH 43614 (419) 666-5136	1-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec at 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID unless otherwise indicated)
Check box if charges are to be collected ☐

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gauthier 1-21-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

David A Boss
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

[signature] 1-21-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60629

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10034
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR (Shipping)	IND040313017	CHEMICAL WASTE MGMT-150 W. 137TH ST. - RIVERDALE, IL 60627 (312) 841-8600	1-21-83
TRANSPORTER # 1	ILD000806604	CHEMICAL-WASTE MGMT-4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-21-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD066111327	EVERGREEN LANDFILL-6525 WALES RD - NORTH JACKSON, OH 44514 (419) 666-5136	1-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20405		

SPECIAL HANDLING INSTRUCTIONS

If an HQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE
PREPAID ☐
COLLECT* ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID) Check box if charges are to be collected (FREIGHT COLLECT)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise as to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Glenn Hartland — 1-21-83
GENERATOR'S SIGNATURE — DATE

This is to certify acceptance of the hazardous waste shipment.

Ed Behan — 1-21-83
TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

[signature] — 1-21-83
TSDF SIGNATURE — DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10035
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	13 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	ILD040313017	CHEMICAL WASTE MGMT - 150 W 137th ST - RIVERDALE, IL (312) 841-8600 60627	1-21-83
TRANSPORTER # 1	ILD006806604	CHEMICAL WASTE MGMT - 4300 W 123rd ST. - ALSIP, IL (312) 396-1060	1-21-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH (419) 666-5200 43619	1-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES (FREIGHT PREPAID except when box at right is checked) ☐ Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency

Gene Hartford 1-21-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

_____
TRANSPORTER #1 SIGNATURE & DATE

_____
TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

O.K. Roberts 1-21-83
TSDF SIGNATURE DATE

STYLE F 80 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10036
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

1019
SHIPPER NUMBER / CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	ILD004031307	CHEMICAL WASTE MGMT. -150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-21-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT-4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-21-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL-6325 WALES RD. - NORTHWOOD, OH 43614 (419) 666-5186	1-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
		D008	HAZARDOUS WASTE SOLID, N.O.S.	NA1989				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (except when box at right is checked) ☐
Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding ____ per ____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 1-21-83

This is to certify acceptance of the hazardous waste shipment.

Ken A Boer — 1-21-83
TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 1-21-83

STYLE F 90 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10037
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1011
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR'S DESCRIPTION	IND040313017	CHEMICAL WASTE MANAGEMENT - 150 W 137th ST. - RIVERDALE, IL 60637 (312) 841-8600	1-24-83
TRANSPORTER # 1	KD000806604	CHEMICAL WASTE MGMT - 4300 W 123rd ST. - ALSIP, IL (312) 396-1060	1-24-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD. NORTHWOOD, OH 43614 (419) 666-5136	1-26-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number (ex: 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID NOS CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding ____ per ____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property, over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 1-24-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE 1-26-83
DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10038
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1016
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT.-150 W. 137th ST.-RIVEROAKE, IL 60827 (312) 841-8600	1-24-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT.-4300 W. 123rd ST.-ALSIP, IL (312) 396-1060	1-24-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD066111327	EVERGREEN LANDFILL-6525 WALES RD-NORTHWOOD, OH 43619 (419) 666-5136	1-25-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #*	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID except when box at right is checked ☐
Check box if charges are to be collected

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Signature

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the terms of bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Whitlow 1-24-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Gary A. Lee 1-24-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D E Roberts 1-25-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10039
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

SHIPPER NUMBER 1006
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	ILD040313017	CHEMICAL WASTE MGMT. - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-24-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT. - 4300 W 123rd ST. - ALSIP, IL (312) 396-1060	1-24-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43619 (419) 666-3136	1-25-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR RQ LABELS REQUIRED	FLASH POINT (IN °C WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

$ _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (except when box of "gift" is checked) ☐
Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartford 1-24-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Craig Lowder 1-24-83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 1-25-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60649

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10040
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC (SCAC)
NAME OF CARRIER

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	CHEMICAL WASTE MGMT-150 W. 137TH ST. RIVERDALE, IL 60627 (312) 841-8600	1-26-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT-4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-26-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD-NORTHWOOD, OH 43614 (419) 666-3136	1-26-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

COD Amt. $

COD FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES (FREIGHT PREPAID) Check box if charges are to be collected ☐

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steve Hartford 1-26-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Craig Bowles 1-26-83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. DeRobert 1-26-83
TSDF SIGNATURE DATE

STYLE F 99 © LABELMASTER CHICAGO IL 50826

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10041
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IDD040313017	CHEMICAL WASTE MGMT-IND W 137HST- RIVERDALE, IL (312) 841-8600 60627	1-26-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT-4300 W 123RD ST. - ALSIP, IL (312) 396 1060	1-26-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111337	EVERGREEN LANDFILL- 6325 WALES RD NORTHWOOD, OH (419) 666-5136 43619	1-26-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA1189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature

Signature of Consignor

FREIGHT PREPAID (Enter by whom paid)

Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Dave Hartland 1-26-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Jay A. Stoy 1-26-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D.E. Roberts 1-26-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10042
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND004313017	CHEMICAL WASTE MGMT - 150 W 137TH ST. - RIVERDALE, IL 60627 (312) 841-8600	1-26-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT - 4300 W. 123rd ST. - ALSIP, IL (312) 396-1060	1-26-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD. - NORTHWOOD, OH 43619 (419) 666-5136	1-26-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA1189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

COD FEE
PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (Check box if charges are to be collected)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Sue Sattler 1-26-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D.C. Roberts 1-26-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO IL 60626

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10043
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC (SCAC)
NAME OF CARRIER

1128
SHIPPER NUMBER / CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	CHEMICAL WASTE MGMT. 150 W 137TH ST. RIVERDALE, IL 60627 (312) 841-8600	1-25-83
TRANSPORTER # 1	OHD018034595	CHEMICAL WASTE MGMT. 504 LIBERTY ST. - FREEMONT, OH 45420 (419) 332-2688	1-25-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD. NORTHWOOD, OH 43619 (419) 666-3136	1-26-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 ROLL-OFF			HAZARDOUS WASTE SOLID, N.O.S SCRAP WOOD	NA1189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call: shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without allowing the consignee the opportunity to make inspection. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignee

COD FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES (FREIGHT PREPAID) Except when box is checked ☐ Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steve Gorton 1-25-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

DE Roberts 1-26-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10045
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATION SHIPPER	IND004313017	CHEMICAL WASTE MGMT.-150 W. 137TH ST-RIVERDALE, IL 60827 (312)841-8600	1-26-83
TRANSPORTER # 1	IL0000804604	CHEMICAL WASTE MGMT.-4300 W. 123RD ST.-ALSIP, IL (312)396-1060	1-26-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD048111327	EVERGREEN LANDFILL-6525 WALES RD.-NORTHWOOD, OH 43619 (419)666-5756	1-26-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR BIO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (except when box at right is checked) ☐
Check box if charges are to be collect

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the Bill of Lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 1-26-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 1-26-83

STYLE F 50 © LABELMASTER CHICAGO, IL 60636

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10050
MANIFEST DOCUMENT NUMBER

5012
SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

1019
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED BY SHIPPER
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT.-150 W. 137 ST.-RIVERDALE, IL 60627 (312) 841-8600	1-27-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT-4300 W. 123rd ST.-ALSIP, IL (312) 396-1060	1-27-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD048111327	EVERGREEN LANDFILL-6535 WALES RD.-NORTHWOOD, OH 43619 (419) 666-5136	1-27-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, NOS CRUSHED DRUMS	NA9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, this incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (UNLESS OTHERWISE NOTED)
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gardner 1-27-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Jay Fogley
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 1-27-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60630

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10051
MANIFEST DOCUMENT NUMBER

3001
SHIPPER NUMBER

1006
CARRIER NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

IDENTIFICATION

	12 EIGHT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATION SHIPPER	ILD040313017	CHEMICAL WASTE MGMT - 150 W. 137 ST - RIVERDALE, IL 60627 (312) 841-8600	1-27-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT - 4300 W. 123rd ST - ALSIP, IL (312) 396-1060	1-27-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43614 (419) 666-5136	1-27-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT OR °C WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

RESHIP C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ per

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

(FREIGHT PREPAID) Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — 1-27-83 DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — 1-27-83 TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — 1-27-83 DATE

STYLE F 60 © LABELMASTER CHICAGO, IL 60639

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10052
MANIFEST DOCUMENT NUMBER

325
SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT INC
NAME OF CARRIER (SCAC)

1016
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND0403130177	CHEMICAL WASTE MGMT. 130 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-27-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT. 4300 W 123rd ST. - ALSIP, IL (312) 396-1060	1-27-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL 6535 DALES RD - NORTHWOOD, OH 43614 (419) 666-5136	1-27-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	UN9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

$ _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 1-27-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Greg A. Tate 1-27-83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 1-27-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL — NOT NEGOTIABLE

10053
MANIFEST DOCUMENT NUMBER

304
SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

1010
CARRIER NUMBER

IDENTIFICATION

	12 EIGHT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT.-150 W. 127TH ST.- RIVERDALE, IL 60627 (312) 841-8600	1-27-83
TRANSPORTER # 1	IL0000806404	CHEMICAL WASTE MGMT-4300 W. 123rd ST. —ALSIP, IL (312) 396-1060	1-27-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD048111327	EVERGREEN LANDFILL-6635 DALES RD-NORTHWOOD, OH 43614 (419) 666-5136	1-27-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS/ CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR RQ LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, NOS. CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged causing a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined, as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — 1-27-83 DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — 1-27-83 DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10055
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

CHEMICAL WASTE MANAGEMENT, INC. (SCAC)
NAME OF CARRIER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR ACCEPTED
GENERATOR/ SHIPPER	ILD040313017	CHEMICAL WASTE MGMT - 150 W. 137th ST. - RIVERDALE, IL 60627 (312) 841-8600	1-28-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT - 4300 W. 123rd ST - ALSIP, IL (312) 396-1060	1-28-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111397	EVERGREEN LANDFILL 6525 WALES RD - NORTHWOOD, OH 43614	1-28-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, NOS CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO:
ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — 1-28-83 DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — 1-28-83 DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10056
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	CHEMICAL WASTE MGMT. - 150 W. 137 ST. - RIVEDALE, IL 60827 (312) 841-8600	1-28-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT - 4300 W. 123RD ST - ALSIP, IL (312) 396-1060	1-28-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111337	EVERGREEN LANDFILL - 6525 WALES RD - NORTHWOOD, OH 43619 (419) 666-5136	1-28-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA1987				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (collect). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or CHEMTREC 1-800-424-9300, immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____.

If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gabbard 1-28-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Forrest B Williams
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

Gilbert 1-28-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60826

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10057
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 EIGHT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	ILD004343017	CHEMICAL WASTE MGMT - ISO W 137 MST · RIVER PARK, IL (317) 844-8600 60477	1-28-83
TRANSPORTER # 1	ILD000806604	CHEMICAL WASTE MGMT - 4300 W 103rd ST - ALSIP, IL (312) 396-1060	1-28-83
TRANSPORTER # 2 (IF required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111307	EVERGREEN LANDFILL - 6575 MILES, RD - NORTH TOLEDO, OH (419) 666-5736 43614	1-28-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, NOS CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (this free or 202 426 2675 toll call) if other DOT Hazardous Materials are discharged (liquids) in a serious situation, call (shipper's telephone number or Chemtrec 1-800-424-9300 (toll free) also).

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. I.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES (Freight Prepaid must enter on all BOL's) Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

If this shipment moves between two ports by a carrier by water, the law requires that the Bill of Lading shall state whether it is "carrier's or shipper's weight."

Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 1-28-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 1-28-83

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10058
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT-WX.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT-150 W 137TH ST RIVERDALE, IL (312) 891-3600 60627	1-28-83
TRANSPORTER # 1	ILD000804004	CHEMICAL WASTE MGMT-4300 W. 123RD ST - ALSIP, IL	1-28-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD048111327	EVERGREEN LANDFILL-6525 WALES RD-NORTHWOOD, OH 43619 (419) 666-5196	1-28-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number (49 CFR 171.01, 172.202, 172.203))	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, NOS CRUSHED DRUMS	NA9189				80 Cyds.		

SPECIAL HANDLING INSTRUCTIONS

If any DOT commodity is handled on a waterway or airport, and the spill must be promptly reported to the Federal government at 800-424-8802 (or there is 202-426-2675 not call), if other DOT hazardous Materials are discharged, OR if a serious situation, call shipper's telephone number in Chemtrec 800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

Signature

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading. The property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 1-28-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 1-28-83

STYLE F 50 © LABELMASTER CHICAGO IL 60639

ORIGINAL – RETURN TO GENERATOR

42-590 O—85——83

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10059
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-1-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-1-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-1-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (95 °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE Solid, NOS CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If a RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (or in DC 202 426-2675). Also, if other DOT Hazardous Materials are discharged causing a serious situation, call shipper's telephone number or Chemtrec 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is hereby agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-1-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

David C Bass
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Robert 2-1-83
TSDF SIGNATURE DATE

STYLE F-56 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10060
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER 1019
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th St, (312) 841-8600 Riverdale, Il. 60627	2-1-83
TRANSPORTER # 1	ILD000805604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-1-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-1-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged causing a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steve Hartline 2-1-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Ken DeBoer
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

DeRoberts 2-1-83
TSDF SIGNATURE DATE

STYLE F 50 © LABEL MASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10061
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1005
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il 60627	2-1-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-1-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-1-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (non toll). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

PREPAY C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (check box if charges are to be prepaid)
(check box if charges are to be collected)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Dave Gartland 2-1-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE

2-1-83
DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10062
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER 1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il 60627	2-2-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il, 60658	2-2-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-2-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE NO #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 Dump TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA9179				2045		

SPECIAL HANDLING INSTRUCTIONS

If an HQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Dave Sartin 2-2-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment

David O Barr
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D E Roberts 2-2-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60826

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10071
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

1005
SHIPPER NUMBER
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il 60627	2-4-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-4-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-4-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

FREIGHT PREPAID (except where specified otherwise in column above)

Check box if charges are not to be collected.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 2-4-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Gary Taylor
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

De Robert 2-4-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL — NOT NEGOTIABLE

10072
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1019
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-4-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-4-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-4-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE NO #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If a RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free or 202 426 2675 Not Less). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec (800 424 9300) immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the conditions of the applicable bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gerstheimer 2-4-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Ken DeBoer
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Robert 2-4-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60625

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10073
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1010
CARRIER NUMBER

IDENTIFICATION

	12 EIGHT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-4-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-4-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-4-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE NO. #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	UA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. I.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

"If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is 'carrier's or shipper's weight.'

Signature

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ per

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gardner 2-4-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

David O. Bass
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE DATE

STYLE F 80 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10074
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 341-8600 Riverdale, Il. 60627	2-7-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, Alsip, Il. 60658 4300 W 123rd ST, (312)396-1050	2-7-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, Northwood, Oh (419)-666-5136 6525 Wales Road	2-7-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °F) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE Solid, N.O.S., CRUSHED DRUMS	NA1989				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free in DC 426-2675 (non-toll) if other DOT Hazardous Materials are involved) and, if a serious situation, call shipper's telephone number or Chemtrec 800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignee shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignee

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Freight charges are prepaid unless marked otherwise.

☐ Check if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the conditions of the Uniform Bill of Lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland
GENERATOR'S SIGNATURE

2-7-83
DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

2-7-83
DATE

STYLE F 50 © LABELMASTER CHICAGO © 10825

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10075
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-7-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-7-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-7-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS 9189	NA				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at: 800 424 8802 (toll free) or 202 426 2675 (collect calls in other DOT Hazardous Materials are to be charged). Additionally, in serious situation, call shipper's telephone number or Chemtrec 800 424 9300, immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. I.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the Bill of Lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions of the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gerhardt 2-7-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Ed Buehler
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

R. Roberts 2-7-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10076
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-7-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-7-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-7-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (collect) If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency

Steve Gerhard 2-7-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment

2-7-83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal

R Gabbard 2-7-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10077
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED (MO. DAY YR)
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-8-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-8-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT/ STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, ~~6525 Wales Road~~ Northwood, Oh (419)-666-5136	2-8-83
TSDF TREATMENT/ STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE NO. #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID except when box at right is checked)
Check box if charges are to be collect ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 2-8-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 2-8-83

1

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10078
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER 1019
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED MO. DAY YR.
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th St. (312) 841-8600 Riverdale, Il. 60627	2-8-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd St. (312)396-1050 Alsip, Il. 60658	2-8-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, ~~6525 Wales Road~~ Northwood, Oh (419)-666-5136	2-8-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number (49 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged, creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ $ _____ per _____

"If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
PREPAID
COLLECT ☐
Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 2-8-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 2-8-83

STYLE F 90 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10079
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER 1006
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8500 Riverdale, Il. 60627	2-8-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-8-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-8-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE NO #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (except when box at right is checked)
Check box if charges are to be collect

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the BIll of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 2-8-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE: 2-8-83

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 2-8-83

STYLE F-80 © LABELMASTER CHICAGO, IL

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER: 10080

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER: 1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il 60627	2-9-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-9-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-9-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (or (area) 202 426-2675 (non toll call)). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ Signature of Consignor

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (Check box if charges are to be billed)
FREIGHT COLLECT ☐ (Check box if charges are to be billed)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-9-83
GENERATOR'S SIGNATURE DATE

This to certify acceptance of the hazardous waste shipment
Barry Eagley
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.
R.E. Roberts 2-9-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10081
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, ~~150 W 137th St, (312) 841-8600~~ Riverdale, Il. 60627	2-9-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd St, (312)396-1050 Alsip, Il. 60658	2-9-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, ~~6525 Wales Road~~ Northwood, Oh (419)-666-5136	2-9-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C WHEN REQ'D)	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189			T	20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

PREPAY
C.O.D. TO
ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
☐ Check if charges will be collected elsewhere
☐ Check if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-9-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

[signature] 2-9-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

[signature] 2-9-83
TSDF SIGNATURE DATE

1

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL - RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10082
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, IL 60627	2-9-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, IL 60658	2-9-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-9-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

In an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (Toll Free) or 202-426-2675 (collect) if other DOT Hazardous Materials are discharged creating a serious situation. Call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. I.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the consignment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID UNLESS OTHERWISE SPECIFIED)
☐ COLLECT

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 2-9-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 2-9-83

STYLE F 50 © LABELMASTER CHICAGO, IL 60639

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10085
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1018
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-10-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-10-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-10-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK			HAZARDOUS WASTE SOLID NOS CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

In an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged causing a serious situation, call shipper's telephone number or Chemtrec (800 424 9300) immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 2-10-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.
Tom Lindsey
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.
D. Roberts 2-10-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10086
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc. (SCAC) 1006
NAME OF CARRIER CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, IL 60627	2-10-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, IL 60658	2-10-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-10-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE NO. #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	D/W # OR NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

COD FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID Check box if charges are to be collected

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-10-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Craig Richards 2-10-83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-10-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60639

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER: 00087

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER: 1019
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management 150 W 137th ST, (312) 841-8600 Riverdale, IL 60527	2-10-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, Alsip, IL 60658 4300 W 123rd ST, (312)396-1150	2-10-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, Northwood, OH 6525 Wales Road (419)-666-5136	2-10-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterways or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the Bill of Lading shall state whether it is "carrier's or shipper's weight."

Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

COD FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-10-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Ed Beine
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment storage or disposal.

D. DeRoberts 2-10-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10089
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER 1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 130 W 137th St, (312) 841-8600 Riverdale, Il. 60627	2-11-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd St, (312)396-1050 Alsip, Il. 60658	2-11-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-11-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 PUMP TRUCK			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

"If this shipment moves between two ports by a carrier by water, the law requires that this bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID except when box at right is checked ☐
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-11-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. L. Roberts 2-11-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60639

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10090
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, IL. 60627	2-11-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-11-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-11-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 (800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (Check box if charges are to be collected)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-11-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Ed Kuchera 2/11/83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

R. Roberts 2-11-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60628

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10091
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1006
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th St, (312) 841-8800 Riverdale, Il. 60627	2-11-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd St, (312)396-1050 Alsip, Il. 60658	2-11-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 0525 Wales Road Northwood, Oh (419)-666-5136	2-11-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR RQ LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 2-11-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Carl Hawk 2-11-83
TRANSPORTER 01 SIGNATURE & DATE TRANSPORTER 02 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

L. Robert 2-11-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL - NOT NEGOTIABLE

10092
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-15-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-15-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD066811327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-15-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number (at 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK			HAZARDOUS WASTE SOLID N.O.S. CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an NQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (or toll free or 202-426-2675 from Washington, D.C.). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD
Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (check box if charges are to be prepaid) ☐
FREIGHT COLLECT (check box if charges are to be collected) ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gerhardt 2-15-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of this hazardous waste shipment.

David C Bar
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

R E Roberts 2-15-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10093
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER

SCAC

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-15-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-15-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-15-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE NO #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or shipping land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call) If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT
C.O.D. TO:
ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gaffney 2-15-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

L.C. Roberts 2-15-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10094
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

| | 12 DIGIT EPA ID #
(For Carrier Use Only) | COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER | DATE SHIPPED OR RECEIVED |
|---|---|---|---|
| GENERATOR/ SHIPPER | IND040313017 | Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627 | 2-15-83 |
| TRANSPORTER # 1 | ILD000806604 | Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658 | 2-15-83 |
| TRANSPORTER # 2 (if required) | | | |
| TSDF TREATMENT STORAGE OR DISPOSAL FACILITY | OHD068111327 | Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136 | 2-15-83 |
| TSDF TREATMENT STORAGE OR DISPOSAL FACILITY | | | |

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 PUMP TRUCK			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an HQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."
_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FREIGHT PREPAID must either be paid or guaranteed by carrier)
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-15-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

George Kochan
TRANSPORTER #1 SIGNATURE & DATE

_____
TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-15-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60628

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10095
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR (SHIPPER)	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-15-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-15-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-15-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.302, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S.	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creativity & serious situation, call shipper's telephone number or Chemtrec 1-800 424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

FREIGHT
C.O.D. TO:
ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding.
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD
Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other carrier charges.

(Signature of Consignor)

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID except when box at right is checked
Check box if charges are to be collect

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steven Hostetler 2-15-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-15-83
TSDF SIGNATURE DATE

STYLE F-59 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10096
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	13 EMBRT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-16-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-16-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-16-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	P		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

COD FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____

"If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

Signature

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steve Gartland 2-16-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

David C Bass
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-16-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60628

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10097
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST. (312) 841-8600 Riverdale, Il. 60627	2-16-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-16-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-16-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged carelessly in a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO:
ADDRESS

COD Amt. $

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (Check box if charges are to be collected)

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-16-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Robarts 2-16-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10098
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

1014
SHIPPER NUMBER / CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-16-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-16-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-16-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

COD Amt $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (except when box A is checked) ☐
Check box if charges are to be collected ☐

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 2-16-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

J. E. Roberts
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60826

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10099
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER 1019
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-16-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-16-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT/ STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-16-83
TSDF TREATMENT/ STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424-8802 (toll free) or 202 426-2675 (toll call). If other DOT Hazardous Materials are discharged carefully, a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO:
ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(Freight Prepaid except when box is checked)
☐ (Check box if charges are to be collected)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 2-16-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Edward Kane Kadlec
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. E. Roberts
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60620

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10100
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1010
CARRIER NUMBER

IDENTIFICATION

	12 EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, IL 60627	2-17-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, IL 60658	2-17-83
TRANSPORTER # 2 (If required)		~~3625 E. Broadway~~ ~~6525 Wales Road~~	
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, Northwood, Oh (419)-666-5136	2-17-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	2		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (unless otherwise specified) ☐
Note: Liability limitation for loss or damage in this shipment may be applicable. See 49 USC 11707.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 2/17/83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TRANSPORTER #2 SIGNATURE & DATE (if required)

TSDF SIGNATURE — DATE: 2-17-83

STYLE F-50 © LABELMASTER CHICAGO IL 60526

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10101
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1007
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-17-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-17-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-17-83
FEDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Mate ials are discharged creating a serious situation, call shipper's telephone number or Chemtrec, 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

COD
Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
If freight prepaid, check box if charges are to be collected at destination ☐
If freight collect, check box if charges are to be collected at destination ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency

Gene Gartner 2-17-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

David A Bass
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

L. DeRoberts 2-17-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL — NOT NEGOTIABLE

10102
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1019
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-17-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-17-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-17-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	DOT # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the Bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gardner 2-17-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Morgan Kuhn
TRANSPORTER #1 SIGNATURE & DATE

_____
TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-17-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60620

ORIGINAL – RETURN TO GENERATOR

10103
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-17-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-17-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-17-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	CPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNIT'S WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-17-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-17-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10104
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il 60627	2-18-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-18-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	L		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (check box if charges are to be prepaid) ☐
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gutierrez 2-18-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of this hazardous waste shipment.

Gary Langley
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D Roberts 2-18-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60625

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10105
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-18-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-18-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number (49 CFR 172.101, 172.202, 172.203)	UN / NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20485		

SPECIAL HANDLING INSTRUCTIONS

If a RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 (800) 424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged causing a serious situation, call shipper's telephone number or Chemtrec 1 (800) 424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(Freight charges are prepaid unless marked otherwise.)
☐ Prepaid ☐ Collect

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract) as mastering any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Bartlett
GENERATOR'S SIGNATURE

2-18-83
DATE

This is to certify acceptance of the hazardous waste shipment.

Seager Kehe
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D Roberts
TSDF SIGNATURE

2-18-83
DATE

STYLE F-50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10106
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-18-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-18-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Liability—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding.

$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ † gravure

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____
(Signature of Consignor)

COD FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

FREIGHT PREPAID AT/TO (named point of origin) | Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gerbl 2-18-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment

David A. Boss
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal

D. Blasts 2-18-83
TSDF SIGNATURE DATE

STYLE F-90 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10107
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-18-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-18-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-18-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR RQ LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. (CRUSHED DRUM)	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

In the commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (in Washington, D.C. area 426-2675). Also, if spills DOT Hazardous Materials are discharged creating a serious situation, an shipper's telephone number or Chemtrec 1-800-424-9300 in these areas.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding.

$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property, over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the conditions of the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and the assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 2-18-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 2-18-83

STYLE # 50 © LABEL MASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10108
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th St, (312) 841-8600 Riverdale, Il. 60627	2-21-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-21-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number (49 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S, CRUSHED DRUMS	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (for trains or 202 426 2675 (for cars). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-21-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.
Gary Fraley
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.
D. Kerdes 2-21-83
TSDF SIGNATURE DATE

STYLE F-90 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10109
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-21-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-21-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD0681'1327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 171.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

In an emergency involving a spill or discharge of hazardous materials, call shipper's telephone number or Chemtrec (800 424 9300) immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gastland 2-21-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-21-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

i0111
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-21-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-21-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, CRUSHED DRUMS NOS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID except when box at right is checked ☐
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 2-21-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Louis Rombo 2-21-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Robert 2-21-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60630

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10112
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-21-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-21-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number (49 CFR 171.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	2		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

In NO community is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call) or other DOT Hazardous Materials are discharged causing a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specified by the shipper to be not exceeding
$ _____ per _____

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight."

Signature

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gastone 2-21-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Joseph Stoll 2-21-83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-21-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10113
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th St, (312) 841-8600 Riverdale, Il. 60627	2-21-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd St, (312)396-1050 Alsip, Il. 60658	2-21-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-21-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

COD Amt $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

RECEIVED subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the abovenamed materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-21-83
GENERATOR'S SIGNATURE DATE

This is to certify receipt of the hazardous waste shipment

Jeremy B. Wadhwa
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-21-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10016
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1010
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-22-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-22-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-23-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	d		HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

In an M-2 community, in spills on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (collect calls). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
If Non-Prepaid Enter Code of Party to be Billed or Indicate Collect
☐ Collect

RECEIVED subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 2-22-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Roy Lackey
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60625

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER: 10117

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER: 1009
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-22-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-22-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-22-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (collect). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES (Check one) PREPAID ☐ COLLECT ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gustafson 2-22-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Roy Chyler 2-22-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-22-83
TSDF SIGNATURE DATE

STYLE F 90 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER: 10018

SHIPPER NUMBER:

Chemical Waste Management, Inc. (SCAC)
NAME OF CARRIER — CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	1-22-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	1-22-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	1-22-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (In °F) WHERE REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID N.O.S. CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If this commodity is spilled on a waterway or adjoining land, the spill must be promptly reported to the Federal government at 1-800-424-8802 (or 202-426-2675 in Washington, D.C.). If other than hazardous materials are discharged causing a serious situation, call shipper's telephone number or chemtrec 800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight."

Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without payment of freight and all other lawful charges, the consignee shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignee

C.O.D. FEE PREPAID ☐ COLLECT ☐ $
TOTAL CHARGES $
FREIGHT CHARGES
Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____
☐ Prepaid ☐ Collect ☐ Cash ☐ Charge to ☐ Third Party

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is hereby agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the governing classifications in effect on the date of shipment.
Shipper hereby certifies that he is familiar with all the terms and conditions in the governing classifications and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steve Hartland 1-22-83
GENERATOR'S SIGNATURE — DATE

This is to certify acceptance of the hazardous waste shipment.

Greg A Hall 1-22-83
TRANSPORTER #1 SIGNATURE & DATE — TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D E Roberts 1-22-83
TSDF SIGNATURE — DATE

STYLE F 50 LABELMASTER CHICAGO IL 60625

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10919
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management 150 W 137th ST, (312) 841-8600 Riverdale, IL. 60627	2-22-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, IL. 60658	2-22-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-22-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	d		HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding $ _____ per _____

*If this shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartford 2-22-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE 2-22-83
DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10020
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER 1019
CARRIER NUMBER

IDENTIFICATION

	12 UNIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-22-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-22-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-22-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	a		HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding.
$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-22-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE

2-22-83
DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60625

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10021
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST. (312) 841-8600 Riverdale, Il. 60627	2-22-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST. (312)396-1050 Aisip, Il. 60658	2-22-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-22-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or N.A. #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If any RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (collect). If other DOT Hazardous Materials are discharged, notify the serious situation call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the BILL OF LADING shall state whether it is 'carrier's or shipper's weight'

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

COD FEE PREPAID ☐ COLLECT ☐ $
TOTAL CHARGES $
FREIGHT CHARGES

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the conditions of the Uniform Domestic Straight Bill of Lading set forth in the Uniform Freight Classification in effect on the date of this contract, and the said conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Shipper hereby certifies that he is familiar with all the terms and conditions of the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 2-22-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (If required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Pollock 2-22-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10023
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-23-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-23-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-23-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (on Texas or 202-426-2675 (on Capitol). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

FREIGHT PREPAID (except when box at right is checked)

Check box if charges are to be collect

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland
GENERATOR'S SIGNATURE

2-23-83
DATE

This is to certify acceptance of the hazardous waste shipment.

Gary Anderson
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Robert
TSDF SIGNATURE

2-23-83
DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10134
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR ACCEPTED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-23-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-23-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-23-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

In an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (or Texas at 202-426-2675). Also, if other DOT Hazardous Materials are discharged during a serious situation, call shipper's telephone number or Chemtrec 800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

COD Amt. $

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight."

_____ Signature

Signature of consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bills of lading terms and conditions of the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-23-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Joseph Lee 2-23-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D.C. Roberts 2-23-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60625

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10125
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-23-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-23-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-23-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS W/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	d		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll calls). If other DOT Hazardous Materials are discharged or spilling a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ Signature of Consignor

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the terms of this Bill of Lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gardland 2-23-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Craig Sowder 2-23-83
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

Dee Robert 2-23-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10126
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-23-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-23-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT/ STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-23-83
TSDF TREATMENT/ STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ (unlimited) is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (dial locally: 202 426 2675) toll calls. If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 (toll-free).

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 400, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (except when sold per "C.I.F." terms)
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-23-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

[signature] 2-23-83
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

[signature] 2-23-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10122
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-23-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-23-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-23-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRUCK	X		HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds.		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor.

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (except when box at right is checked)
Check box if charges are to be collected

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-23-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TRANSPORTER #2 SIGNATURE & DATE (if required)

2-23-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60826

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10063
MANIFEST DOCUMENT N

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER
1005
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, IL 60627	2-2-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, IL 60658	2-2-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-2-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 Dump Trailer			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If any commodity is carried on a waterway or adjoining land, the spill must be promptly reported to the Federal government at 1-800-424-8802 (Washington, D.C. 202-426-2675) and also (other DOT Hazardous Materials are discharged during a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

Consignee's Signature

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-2-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment

Ron Le Roy
TRANSPORTER SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

J. Roberts 2-2-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10064
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-2-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-2-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-2-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically, in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(Freight Prepaid except when box at right is checked)
Check box if charges are to be collected ☐

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartman 2-2-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Ken DeBoer
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. E. Roberts 2-2-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10065
MANIFEST DOCUMENT NUMBER

CHEMICAL WASTE MANAGEMENT, INC.
NAME OF CARRIER (SCAC)

1128
SHIPPER NUMBER / CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	CHEMICAL WASTE MGMT - 150 W 137th ST - RIVERDALE, IL 60627 (312) 841-8600	2-2-83
TRANSPORTER # 1	OHD018034595	CHEMICAL WASTE MGMT - 504 LIBERTY ST. FREEMONT, OH 43420 (419) 332-2688	2-2-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	EVERGREEN LANDFILL 6525 WALES RD - NORTHWOOD, OH 43619 (419) 666-5136	2-3-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 Roll-off			HAZARDOUS WASTE SOLID, N.O.S. WOOD	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the National government at 1-800-424-8802 (in the D.C. area 202-426-2675). Also notify 911 or the DOT Hazardous Materials area for the state if creating a serious situation. Tell shipper's telephone number in Chemtrec 800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item #30, Sec. I.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $
TOTAL CHARGES $

FREIGHT CHARGES

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract) as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is hereby agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

GENERATOR'S SIGNATURE — DATE: 2-2-83

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE: 2-2-83

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TSDF SIGNATURE — DATE: 2-3-83

STYLE F 50 © LABELMASTER CHICAGO IL 60635

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10066
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

1500
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th St, (312) 841-8600 Riverdale, Il. 60627	2-2-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-2-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, ~~6525 Wales Road~~ Northwood, Oh (419)-666-5136	2-2-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 VAN TRAILER			38-55 gal. Drums HAZARDOUS WASTE SOLID, N.O.S. (DEA-E	NA9187				76 drms.		
		D001	38-55 gal drums Flammable SOLID, N.O.S	UN1325						

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding.
$ _____ PP _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Irene Gartland 2-2-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

I hereby certify acceptance of the hazardous waste for treatment, storage or disposal.

D E Hedrick 2-2-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10067
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313C17	Chemical Waste Management, 150 W 137th St, (312) 841-8600 Riverdale, Il. 60627	2-3-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd St, (312)396-1050 Alsip, Il. 60658	2-3-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-3-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S CRUSHED DRUMS	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal Government at 1 800 424 8802 (toll free) or 202 426 2675 (collect). Any other DOT Hazardous Materials are Discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300, immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 4X, Sec. I

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

COD Amt. $

C.O.D. FEE PREPAID ☐ COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

Signature

Signature of Consignor

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property, over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-3-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Kean De Boer
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-3-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10068
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR/ SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-3-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-3-83
TRANSPORTER # 2 (If required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-3-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D.	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

_____ Signature

COD Amt: $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE (PREPAID ☐ COLLECT ☐) $

TOTAL CHARGES $

FREIGHT CHARGES

If this shipment is to be picked up at (name and address) ☐ Check box if charges are to be collected.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the conditions of the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Gartland 2-3-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

David C Bo
TRANSPORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. DeRoberts 2-3-83
TSDF SIGNATURE DATE

STYLE F 50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10069
MANIFEST DOCUMENT NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

1005
SHIPPER NUMBER
CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-3-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-3-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-3-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (in °C) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
1 DUMP TRAILER			HAZARDOUS WASTE SOLID, N.O.S. CRUSHED DRUMS	NA 9189				20 yds		

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding.
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight"

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

C.O.D. FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
(FOR CARRIER USE ONLY) PREPAID ☐ COLLECT ☐ Check applicable blocks

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Gene Hartland 2-3 83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

TRANSPORTER #2 SIGNATURE & DATE (if required)

D. E. Roberts 2-3-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

ORIGINAL – RETURN TO GENERATOR

HAZARDOUS WASTE MANIFEST

ORIGINAL – NOT NEGOTIABLE

10070
MANIFEST DOCUMENT NUMBER

SHIPPER NUMBER

Chemical Waste Management, Inc.
NAME OF CARRIER (SCAC)

CARRIER NUMBER

IDENTIFICATION

	12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER	IND040313017	Chemical Waste Management, 150 W 137th ST, (312) 841-8600 Riverdale, Il. 60627	2-3-83
TRANSPORTER # 1	ILD000806604	Chemical Waste Management, 4300 W 123rd ST, (312)396-1050 Alsip, Il. 60658	2-3-83
TRANSPORTER # 2 (if required)			
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY	OHD068111327	Evergreen Landfill, 6525 Wales Road Northwood, Oh (419)-666-5136	2-4-83
TSDF TREATMENT STORAGE OR DISPOSAL FACILITY			

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # or NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °F) WHEN REQ'D	UNITS WT/VOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
3	X		3 - 55 GAL DR HAZARDOUS WASTE SOLID, N.O.S. ORM-E	NA9189				2485 gal. OVERPACKS		
18	X		18 - 85 GAL DR HAZARDOUS WASTE SOLID N.O.S. ORM-E	NA9189						
9	X	D001	9 - 55 GAL DR FLAMMABLE SOLID, N.O.S.	UN1325				4455 gal. drums		
6	X	D001	6 - 85 GAL DR FLAMMABLE SOLID, N.O.S.	UN1325						

SPECIAL HANDLING INSTRUCTIONS

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1 800 424 8802 (toll free) or 202 426 2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1 800 424 9300 immediately.

COMMENTS

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

PLACARDS TENDERED
Yes ☐ No ☐

REMIT C.O.D. TO: ADDRESS

Note – Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

_____ Signature

COD Amt. $

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ Signature of Consignor

COD FEE
PREPAID ☐
COLLECT ☐ $

TOTAL CHARGES $

FREIGHT CHARGES
FREIGHT PREPAID (unless otherwise specified)
Check box if charges are to be collected

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Steve Hartland 2-3-83
GENERATOR'S SIGNATURE DATE

This is to certify acceptance of the hazardous waste shipment.

Ike Fredrick
TRANSPORTER #1 SIGNATURE & DATE

TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

D. Roberts 2-4-83
TSDF SIGNATURE DATE

STYLE F-50 © LABELMASTER CHICAGO IL 60826

ORIGINAL – RETURN TO GENERATOR

Mr. LEVITAS. Now, let me ask you a couple of questions about that. I'm looking at the work plan on page, roman numeral VI-3. And I'll just read part of it to you, because I don't read it the same way that you interpret it. Here's what it says:

> Again, due to the unknowns relative to volumes, types, and constituents of materials at Seymour Recycling Center, it is difficult to quantify the exact volumes, types and waste that will go to each facility. However, based upon our review and visitation of the Seymour site, and further based upon our experience in the field of site mitigation, it is possible to specify those facilities which will be utilized in the treatment/disposal of the waste at Seymour, all of which are owned and operated by Chemical Waste Management or by our parent company, Waste Management, Inc. Those facilities are as follows: List.

Now, there are ways in which a list can be identified as illustrative. You can say: "For example," or "By way of illustration," or "Included." None of those terms were used. It said: "It is possible to specify." And I have an idea why that was used, and why you wanted to specify, and why the people who were going to enter a contract with you wanted you to specify—I believe that there are a lot of good reasons for it. But as I read that, Mr. Diver, it sounds to me like you were telling them: This is where it is going to go. And I just wondered about that.

What—let me back up. Rather than me assume, why would you want to make a list of any sort instead of simply saying, generically, will send it to facilities we own and operate that are appropriately permitted to receive this waste.

Mr. DIVER. Let me ask Mr. Bock to answer this question. As I understand it, the work plan was not prepared by the attorneys for Chem Waste. It was prepared by the operating personnel in ENRAC.

Mr. BOCK. We have asked ourselves that question many times since we wrote that down. I can't really give you a good answer to that. Again, it was our intention in writing that that it was to be illustrative. And I recognize by the language that you could construe it as not being illustrative.

Let me add two things, however, to the Evergreen saga that I think are important. No. 1, the reason we sent waste materials at all to the Evergreen facility, we had not done that prior to notifying the onscene coordinator verbally. The unfortunate circumstance, however, was that we did not document that conversation and the date of that conversation.

Mr. LEVITAS. Which conversation?

Mr. BOCK. The conversation with the onscene coordinator for EPA where we indicated that we were going to send it to the Evergreen facility.

Mr. LEVITAS. Right. Because as I recall one of your obligations in section V is for your employee to verbally update the appropriate authority of all shipments or traffic into and out of the site.

Mr. BOCK. Exactly. I'd like to get to that as a second point.

But, in any event, our site manager at that point in time indicated to us, and unfortunately when you really start to press very hard as to dates and times and so forth, people's memories are not as clear as when they first came to you with that. In any event, because it was not well documented, it was certainly not an argu-

ment that we could win with EPA that we had received prior approval, so we did not pursue that.

However, we did document, and it was accessible to EPA or anbody else visiting the facility, we did document each and every shipment of waste that went to which facility by waste type, manifest number, and so forth. So we had shipped several loads to the Evergreen facility prior to this accident having occurred. And that information was readily available to anyone who chose to visit the site and look at the records.

Mr. LEVITAS. Well, you're going to give us those documents that would indicate these shipments including this one.

Now, and let me say that this is one of my major concerns about the operation of this particular project—I have a lot, but this is a major one. Now, for a number of reasons where there is an agreement that is entered into with specifications made and, in this case, approved by the court, and the contractor—whether it's Chemical Waste or anybody else—is not being properly supervised either by the contracted parties themselves, or by the Government, and they are not doing the things they say they are going to do, we have a real mess. We've got a problem. Because what we've done is we've papered over what we are trying to deal with. Which is the proper disposal of this hazardous waste. That's why we have all of these agreements and specifications.

I've got an affidavit here, which I am sure you are familiar with, from the—it's dated March 23, 1983, and it's part of the district court supervision of this whole matter, by Beverly Kush. Beverly Kush, as I understand it, is the onsite coordinator for USEPA at Seymour. And she says this:

> That I was told by Scott Schedell of Chemical Waste Management that trucks had taken crushed drums off the site that morning for Evergreen Landfill in Northwood, Ohio. This is the first time I learned of CWM's use of the Evergreen Landfill. I called Mr. Schedell's attention to the fact that the Evergreen Landfill was not one of the six facilities for disposal listed in the work plan.

Now, does Mr. Schedell have a different recollection?

Mr. BOCK. Again, when the issue first came up, we questioned Scott. And Scott, in his own mind, felt that he had clearly talked to Beverly Kush prior to sending any shipments. However, after talking with them and trying to pin down a time and date and so forth, I feel that neither he nor we would care to cast in stone what he initially thought was the first time he had talked to Beverly Kush.

However, again I refer back to those records of the shipments that were available on a daily basis of where waste materials went. And that would have clearly indicated where each shipment was going to and what facility was being used.

Mr. MOLINARI. Would the gentleman yield?

Mr. LEVITAS. By the way, without objection the Kush memo will be made a part of the record.

[Information received from Mr. Bock follows:]

IN THE UNITED STATES DISTRICT COURT
FOR THE SOURTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA, Plaintiff,	)	
v.	)	CIVIL ACTION NO. IP 80-457-C
SEYMOUR RECYCLING CORPORATION et al., Defendants.	)	

AFFIDAVIT

County of Cook)
) SS
State of Illinois)

I, Beverly Kush, being first duly sworn do hereby affirm and say as follows:

1. Since January 1981, I have been employed as an on scene co-ordinator by the United States Environmental Protection Agency (U.S. EPA) Region V.

2. In that capacity, I am assigned as the U.S. EPA on scene co-ordinator of clean-up activities at the Seymour Recycling Corporation (Seymour) site.

3. As part of my duties, I made a routine site visit on January 17, 1983. During that visit, I was told by Scott Schedell of Chemical Waste Management, Inc. ("CWM") that trucks had taken crushed drums off the site that morning for disposal at Evergreen Landfill in Northwood, Ohio. This was the first time I learned of CWM's use of the Evergreen Landfill. I called Mr. Schedell's attention to the fact that Evergreen Landfill was not one of the six facilities for disposal listed in the work plan appended to the consent decree. I told Mr. Schedell that although the Evergreen site itself did not appear to be a problem, the use of a non-listed site must be looked into. I

did not, however, expressly order CWM to stop making shipments to Evergreen Landfill.

4. Also on January 17, 1983, I was told by Mr. Schedell that CWM was in the process of purchasing a disposal facility called Solvent Recovery and Reclamation ("SRR") and would like to send waste there. My impression was that any disposal at SRR would not take place for a month or two. I indicated that the site seemed acceptable but that because it was not listed in the consent decree it would have to be looked into.

5. On January 26, 1983, I made another routine site visit. At this time, no one from CWM told me about any shipments to SRR.

6. On February 1, 1983, I spoke with Robert Morris, a trustee under the consent decree. Mr. Morris told me that CWM had recyclable materials at Seymour that it would like to take to SRR. He told me that he had spoken with the U.S. EPA's Office of Solid Waste in Washington, D.C. and the Indiana State Board of Health. Mr. Morris said that since SRR was not a site listed in the decree and since recycling was not specifically mentioned in the work plan, the appropriate written request and notifications would be made. CWM did not submit such a request until March 14, 1983.

7. During the first week of February , I received a copy of CWM's monthly activity report which recorded three shipments to SRR, two on January 26, 1983 and one on January 27, 1983. This was the first time I learned of the shipments to SRR.

Further affiant sayeth naught:

Dated: March 23, 1983

Beverly Kush
Beverly Kush

Subscribed and sworn before me this 23 day of March, 1983.

Dorothy Uttermeyer
Notary Public
My Commission expires July 22, 1986

Mr. MOLINARI. My understanding or recollection of the testimony of Ms. Kush was that the reports that she would receive concerning shipments were on a monthly basis. And when I questioned her about this accident where the truck hit the bridge, in light of why it was that she wasn't aware that shipments were going to Evergreen, she said, in effect, that she would have known about it anyhow subsequently when she received the monthly statement from your corporation.

Mr. BOCK. Exactly. Our requirement was to submit those records on a monthly basis. That, however, did not prohibit anybody from examining those records on a daily basis.

Mr. MOLINARI. OK. Let me ask you: Was there any monitoring going on, on a daily basis by the Environmental Protection Agency of those manifests?

Mr. BOCK. Having myself not been out there on a daily basis, I really can't respond to that accurately. I don't know.

Mr. MOLINARI. Do you know whether there was any monitoring, whatsoever, other than the receipt of the monthly statement which you mandated be sent to you?

Mr. BOCK. Again, for the same reason, having not been there, I assume that there was, but I can't give you a positive statement that there was or there was not.

Mr. LEVITAS. I'm going to try to wrap this part up and then yield to Mrs. Johnson, recognize Mrs. Johnson, so we can break off for lunch recess.

There was some discussion of a site known as "Solvents Reclamation and Recovery." That's a site which is, "(A)" not listed, and "(B)" other than the Evergreen site; is that correct?

Mr. BOCK. That's correct.

Mr. LEVITAS. Where is that located?

Mr. BOCK. That's located in West Carrollton, OH.

Mr. LEVITAS. Now, it appears that someone from Chemical Waste, and I'm not sure who, it doesn't make any difference, really, told Ms. Kush that Chemical Waste was in the process of buying the solvents, reclamation and recovery facility and intended to send waste to that site.

Mr. BOCK. I don't know the timing, if we had already acquired it or were about to acquire it. The name of the company, by the way, is Solvent Resource Recovery.

Mr. LEVITAS. All right. And it is now owned by Chemical Waste Management or an affiliate?

Mr. BOCK. Correct.

Mr. DIVER. It is either a direct subsidiary today of Chemical Waste Management or it is Chemical Waste Management.

Mr. LEVITAS. But you're not clear whether it was in the process of being acquired, or had been acquired already?

Mr. DIVER. At the time that the material was sent to Solvent Resource Recovery, it was, at that time, a member of Chemical Management.

Mr. LEVITAS. OK.

Now, listed on the facilities that are specified is No. 6, the incineration ship of *Vulcanus.*

Now, I take it that *Vulcanus* was not then nor is it now permitted.

Mr. DIVER. When, Mr. Chairman?

Mr. LEVITAS. In 1982.

Mr. DIVER. Yes. It was.

Mr. LEVITAS. In August 1982?

Mr. DIVER. It was in August 1982 a permitted vessel having accomplished its second permitted burn——

Mr. LEVITAS. Was this a test burn or was it an interim burn?

Mr. DIVER. This would have been the research permit.

Mr. LEVITAS. Oh, this was just to test is the answer to my question.

Mr. DIVER. Right. But the second burn actually occurred under that research permit around August 17, 1982.

Mr. LEVITAS. At the time of the consent decree, was the third burn permitted?

Mr. DIVER. At the time of the consent decree, the research permit had expired by 13 days.

Mr. LEVITAS. Was any of the material from the Seymour site incinerated in any test burn on the *Vulcanus*?

Mr. DIVER. I don't believe so. No.

Mr. LEVITAS. In that connection, I notice that in the list of sites, one of them, Calumet City, has the capability of neutralization, solidification; the Alabama site, incineration, neutralization, solidification, *Vulcanus* incineration. Was any of the material taken from the Seymour site either incinerated or neutralized or solidified?

Mr. DIVER. Yes.

Mr. LEVITAS. At which site?

Mr. DIVER. I believe the primary site we utilized for most of the material from the Seymour facility, was at our Emelle site.

Mr. LEVITAS. And at that site there was incineration, neutralization, solidification?

Mr. DIVER. Correct.

Mr. LEVITAS. Do you have—and you can furnish this if you don't have the information now—the respective quantities in terms of percentage of the total, that were incinerated, neutralized, and solidified compared to those which were buried?

Mr. DIVER. We don't actually have that, but we will provide that.

[Information received from Mr. Diver follows:]

SEYMOUR RECYCLING CENTER, SUMMARY OF TREATMENT/DISPOSAL ACTIVITIES, PROJECT COMPLETION: JANUARY 1984

The following information represents a summary of the treatment and disposal activities performed during the progress of the Seymour clean-up. The data supplied is based upon actual operations and manifest data and conversion factors have been applied to make the data consistently reportable on a tonnage basis.

SEYMOUR RECYCLING WASTE MATERIAL DISPOSITION

[All figures in tons]

	Incineration	Treatment	Secure land disposal	Deepwell
Waste materials:				
Solids		104	211	
Sludges		1,001	949	
Corrosives		149	172	
Organics/inorganics	572	3,227	3,899	500

SEYMOUR RECYCLING WASTE MATERIAL DISPOSITION—Continued

[All figures in tons]

	Incineration	Treatment	Secure land disposal	Deepwell
Laboratory wastes		19	44	
Total	572	4,500	5,275	500
Non-treatable materials:				
Dismantled tanks			146	
Soil			14,838	
Miscellaneous debris			600	
Emptied/crushed drums			1,854	
Total	0	0	17,438	0

Mr. LEVITAS. Yesterday, I was interested to hear from the settling group that they really never—that they talked about recycling and incineration, but that was not expected to be the major source or method of disposal in this instance.

Mr. DIVER. I don't think it was realistic, out front, with as little as we knew about the Seymour site and the wastes that were there, to try to make any kind of conclusions as to how the material would be treated and disposed of.

Mr. LEVITAS. OK.

Mr. Diver, in discussing the problem of the untarped shipment, was the—that was involved in the truck accident that we have already talked about, you say on page 8 of your testimony: "Having failed in this instance to cover the cargo area of one of our trucks with a protective tarpaulin"—now as I read that, this was just one of those freaks that just—this one truck happened to slip out the door without its tarp on. As far as you know, was this the only incident of that? Or were they just sort of coming and going?

Mr. DIVER. I don't know, Mr. Chairman. Perhaps Ray can answer that.

Mr. BOCK. I do not know if there were or were not any prior loads that had gone out without a tarp. I can assure you that following that incident there was not a truck that went out without a tarp.

Mr. LEVITAS. We all learn——

Mr. BOCK. Yes. We do.

Mr. LEVITAS [continuing]. By our mistakes.

Mr. BOCK. Yes.

Mr. LEVITAS. But you recall, I'm sure, that as part of the work plan that there was a specific requirement—not one created after the accident, but as part of the work plan that says: "All vehicles will be tarped prior to leaving the Seymour Recycling Center."

Mr. BOCK. We are aware of that.

Mr. LEVITAS. OK. Again, the reason I mention that is that one of our concerns is that if we sanction the entering into of agreements of this sort which have provisions in them which are to protect the public in some way, and we see this type of situation, you know, whose responsibility is it to see that that doesn't occur? Is it the responsibility of the people who contract with you? Obviously, it is

your responsibility. But I mean over and above that, people who contract with you, or Government officials or what?

One last question and then, Ms. Johnson, it's yours.

Mr. MOLINARI. Before we leave that, Mr. Chairman, will you yield?

Mr. LEVITAS. Certainly.

Mr. MOLINARI. I get the impression that if not for the accident, we would not have known that shipments were going to sites other than those specified in the consent decree. And certainly, we wouldn't have known that there was a truck carrying waste from a site that did not have a protective tarpaulin on it.

Now it seems to me that good management practices would have dictated that an investigation would have been conducted by your company at that point in time to determine whether, in fact, the practice of shipping to Evergreen was with uncovered trucks without tarpaulins. Do you mean to tell me that that wasn't done?

Mr. BOCK. To my knowledge that was not done. Again, part of the problem—If you take a look at the things that occurred, from our perspective, basically they are due to administrative failures, if you will. While I cannot justify, nor would I attempt to justify the mistakes that were made—and we clearly admit that there were mistakes and we moved rapidly to solve them--at any rate, administratively we fell down at the beginning of the project. And the basis for that, again I can't justify it, but the basis or the rationale behind why that occurred is that this was the first major project of its size, the largest major project in the Superfund area that had been done.

It was very complex. There was a great deal of work to be done out front in mobilizing efforts and hiring people and training people and so forth, and all the attention was focused on the operating aspect of it. And not enough attention, as we found out when we went back in to take a look at why these things occurred, not enough attention was paid to the administrative aspect to be sure, in fact, we were covering both the intent and the letter of the technical proposal and the consent decree.

We went back and remedied that with internal people as well as external and outside consultants that we hired to come in and also review our procedures and the technical proposal and the consent decree and see where we were not in compliance with that.

Mr. MOLINARI. I'm being very simple in my questioning. We have a truck that is carrying wastes that are, at least, hazardous. The reason for covering the top was obviously to prevent airborne emissions which could present a health hazard to the community. An accident occurs and then it's discovered that this particular truck did not have a tarpaulin.

One would think that with the reputation that your company has, you would want to check to find out if the driver was responsible; was it the people responsible for loading and shipping that were responsible; and in fact, was this a practice that they had been guilty of in the past. And now I'm hearing administrative error. I think this is far more serious than an administrative error.

Mr. BOCK. I will grant you that the error was certainly more serious than an administrative error——

Mr. MOLINARI. You might want to fire the guy that was responsible if you found that it wasn't just this one truck load, but a number of truck loads prior thereto. That he wasn't adhering to established practices by your corporation.

Mr. BOCK. We did put some additional people on that facility following that incident.

Mr. MOLINARI. Did you fire the guy?

Mr. BOCK. I am not aware whether we fired anybody at that particular point in time.

Mr. MOLINARI. Did you find out whether there were other shipments before this that were uncovered that were sent out to Evergreen?

Mr. BOCK. As I indicated, I don't believe we did that.

Mr. MOLINARI. You don't believe you sent any or don't believe you checked.

Mr. BOCK. I don't know whether we did, in fact, do it or not. I don't believe we went back to check because I did not hear of any results.

Mr. MOLINARI. Well, I find that rather surprising.

I'll pass, Mr. Chairman.

Mr. LEVITAS. Let me just conclude with this: Your first ballpark figure is an estimated $9.8 million for the surface cleanup. How much soil removal did that contemplate?

Mr. BOCK. I really don't recall how much soil removal that that did take into consideration.

Mr. LEVITAS. We heard testimony yesterday and the day before that the business of surface versus subsurface is a rather arbitrary decision and that, at one point, EPA was talking about removal of 5 feet of topsoil. And it ultimately ended up with the removal of 1 foot of topsoil. An some people argued that it shouldn't have removed any of the topsoil as part of the surface cleanup.

My question is: Were you aware of the EPA proposal for 5 feet of removal? Who made the decision? With whom did you discuss going from 5 feet to 1 foot, and can you confirm that this resulted in a savings of about $4.4 million.

Mr. BOCK. To answer the first part of the question, I don't recall hearing in any discussions with EPA hearing about 5 feet of soil. And I don't recall, personally, that report, until it was brought up in the OTA's testimony—an EPA report suggesting that 5 feet of soil should be removed.

With respect to how the 1 foot of soil was arrived at, I believe it was the generators initial negotiating position that they didn't feel that soil should be removed at all. That was deemed unacceptable by EPA. And the next step, I believe, in that negotiating process was that the hot spots, the possibly contaminated soil, would then be removed. And that, again, was deemed not appropriate by EPA or not acceptable.

Finally where it got to, what was decided upon, was that a foot of soil would be removed from beneath the areas where the drums were stored and stacked, many of which were leaking. And that also encompassed some of the visibly contaminated soil areas.

And the foot is really an arbitrary-type level of removal. But it is fairly consistent with many other projects that EPA has done in the past where a foot of removal is more or less a standard type

practice. There are several other facilities where, I believe, that has been done. I believe it was done at Chemdyne, at Bluff Road, the Geneva Industry site, Barker Chemical site. It's more or less a common practice, 1 foot. I don't think, technically, it can be justified. But essentially that's——

Mr. LEVITAS. There's unanimity on that point. Nobody seems to think it's anything other than arbitrary.

Mr. BOCK. It's more or less a common practice. It's been done at several sites.

Mr. LEVITAS. And yet no one seems to have any justification for doing it at all—you know, 1 foot, 2 feet, 3 feet, 1 meter.

Mrs. Johnson.

Mrs. JOHNSON. Yes; I want to pursue that point a little further.

Mr. Diver, you cite in your testimony having come back and done a technical evaluation and bid. Now, on what basis did you make those proposals? How much scientific data did you have about the site, about surface contamination, and did you do any well testing for subsurface contamination?

Mr. BOCK. We had, prior to your getting here that question had been asked, but I'll certainly go through this again. We had——

Mrs. JOHNSON. That's all right. I can look back on the transcript. I thought that it hadn't been asked. It is late enough, so we won't ask you to go through that again.

Mr. BOCK. Very quickly, though, there was very little data for us to utilize.

Mrs. JOHNSON. You were saying something about that when I came in, but it was so little.

In terms of the truck accident, that truck was on its way to Evergreen?

Mr. BOCK. That's correct.

Mrs. JOHNSON. And since it was January 25, there was no previous monthly report that might have recorded shipments to Evergreen that might have been reviewed by the onscene coordinator?

Mr. BOCK. Well, the monthly report that I think you are referring to is really the monthly report that we have to submit to the court itself. The monthly reports that would indicate where materials were going, the manifest log, that was submitted routinely to EPA because they were right there on the site. You could, literally, hand it to them.

Mr. DIVER. It's an onsite generated document.

Mrs. JOHNSON. But you're not handing it to them daily, you're handing it to them monthly?

Mr. DIVER. No; basically it's almost everyday.

Mr. BOCK. The USEPA was there almost everyday.

Mrs. JOHNSON. Well, was January 25 the first shipment to Evergreen by any truck?

Mr. BOCK. I believe that we shipped a total of 52 or 53 loads to the Evergreen facility. I do not believe that that was the first load, and I would expect with that number of loads having been shipped, some loads would have to have been shipped prior to that to get 52 loads.

Mrs. JOHNSON. Well, you certainly have the records to show whether any went to Evergreen before that and those are the records that the committee will be receiving?

Mr. BOCK. Correct.

Mrs. JOHNSON. Thank you.

Thank you, Mr. Chairman.

Mr. LEVITAS. Mr. Andrews.

Mr. ANDREWS. Mr. Chairman, I don't have any questions at this time.

Mr. LEVITAS. Thank you.

Well, then this might be a good stopping point. I know I've got a few questions more. Why don't we recess at this time until, let's say, 1:45.

The subcommittee, therefore, will stand in recess until 1:45 p.m.

[Whereupon, at 12:22 p.m., the hearing was recessed, to reconvene at 1:45 p.m., this same day.]

AFTERNOON SESSION

Mr. LEVITAS. The subcommittee will please come to order.

The Chair recognizes the gentleman from New York.

Mr. MOLINARI. I would like to pick up with where we were before, with the shipment of wastes from the Seymour site. There were five sites identified in the consent decree?

Mr. BOCK. There were six initially that were specifically listed.

Mr. MOLINARI. Now, in addition to that, there was temporary trucking of some of the disposed material to Evergreen.

Mr. BOCK. Correct.

Mr. MOLINARI. Now, is my understanding correct there were no other sites involved other than those seven?

Mr. BOCK. At one point we had considered our SRR facility in West Carrollton. We had shipped material to that facility, and subsequently retrieved it for really two reasons. The first reason was obviously it had the same problem as did the Evergreen facility because it was specifically listed. And the second reason essentially was that the yield—in other words, the reclaimable product—was not as good as we had expected it might be.

And obviously, that would tend to lead you to the conclusion that that is why the material was sitting on the Seymour Recycling Center because they obviously had the same problem.

Mr. MOLINARI. Now, would I be correct in assuming that most of the material wound up at the ML site in Alabama?

Mr. BOCK. I would think the majority wound up there; correct.

Mr. MOLINARI. Would you give me some estimation percentagewise?

Mr. BOCK. It is really difficult. I don't believe on a volumetric basis it was 50 percent of the material. It was something less than that.

Mr. MOLINARI. Something less?

Mr. BOCK. Correct.

Mr. MOLINARI. Is any of the material that is there today awaiting incineration?

Mr. BOCK. There is approximately 125,000 to 127,000 gallons awaiting incineration of PCB's. Essentially, the PCB's, too—I think this is noteworthy as relates to that material—the vast majority of that material, by regulation, could have been solidified and buried.

We decided that it would be a better thing to do with that material to incinerate it. So we shipped it down there for incineration.

Mr. MOLINARI. Well, that raises an interesting question because most of the settlers that we have heard from in their testimony—I even raised the question as to whether they did not get together and go over their testimony because they all seemed to make the same point—one of the points they made was that they favored incineration where possible, as opposed to burial. Yet you are telling me that you had the ability under contract here to bury rather than to incinerate.

Mr. BOCK. Under regulation, not under contract. Under regulation we had the ability to solidify and bury that material.

Mr. MOLINARI. How about contract?

Mr. BOCK. Under the contract as written, we would also have that ability.

Mr. MOLINARI. So they weren't pursuing their own policy objectives then, as they pronounced them in the subcommittee, and when it came to the disposal of waste, they favored incineration as the primary objective?

Mr. BOCK. That is what they indicated, yes.

Mr. MOLINARI. What about ML? I have received some information indicating there are some problems at the ML site. Is that something that is being looked at today? Do you have some problems at ML with respect to lack of containment or substances that are leaking out of the area that is supposed to be contained?

Mr. BOCK. I think Mr. Diver can probably best respond to that. He has been more involved in that type of situation.

Mr. DIVER. I am not aware of leakage out of any containment unit at ML. I wonder if the Congressman could flesh out. I am not aware of anything leaking out.

Mr. MOLINARI. Well, let me rephrase the question then. Is there any area at ML that is of concern to Chemical Waste Management that you are looking at today?

Mr. DIVER. There is not a particular area of ML that we're looking at today with regard to the compliance status of that facility. The committee should be aware that we have a program that involves having independent compliance officers at the sites to identify problems before they become serious problems so that they can be corrected. But I am not aware as we sit here today of a problem at the ML facility.

Mr. MOLINARI. Now, if there was a problem there and there was a study of that problem, you would know about it, I assume, in your capacity as general counsel?

Mr. DIVER. Yes; I would assume in the usual routine I would.

Mr. MOLINARI. Now, when you use the EPA—did you just get some information?

Mr. DIVER. Just reminding me of something that I didn't really think fit within the scope of your question.

Mr. MOLINARI. OK. It's not a problem.

Mr. DIVER. No.

Mr. MOLINARI. OK. Now let's get back to the practices that you had in force. You used the EPA manifest system?

Mr. DIVER. Yes. For the materials coming out of Seymour?

Mr. MOLINARI. Yes.

Mr. DIVER. Yes.

Mr. MOLINARI. And as a shipment went out, the manifest would have been completed to the extent that the material would be identified and the quantity?

Mr. DIVER. Material, quantity, containerization.

Mr. MOLINARI. And destination?

Mr. DIVER. Destination, correct.

Mr. MOLINARI. And that was kept at your headquarters? Where was the information kept?

Mr. BOCK. That information was kept at the site, right at the facility.

Mr. MOLINARI. At the site. OK. Anyplace else? Did you have a duplicate set?

Mr. BOCK. We had duplicate sets sent to our corporate office. In fact, since you had asked this question earlier, during the break we have submitted to you the monthly reports that we had sent to the court. In the back there are the summary sheets that we would fill out on a daily basis, reporting shipments. So you should have that information in hand right now.

Mr. MOLINARI. That is the monthly reports?

Mr. BOCK. Well, the monthly reports to the judge. Correct. But in that monthly report, as part of that monthly report were the summary sheets of all the loads.

Mr. MOLINARI. The point I am trying to get at is this, that this information was maintained at the site?

Mr. BOCK. Correct.

Mr. MOLINARI. And if the manifest system was being carried out as it was supposed to be, the information that material was being shipped within the site specified in the consent decree should have been readily available to the onsite coordinator?

Mr. BOCK. Correct.

Mr. MOLINARI. Correct?

Mr. BOCK. Correct.

Mr. DIVER. Correct.

Mr. MOLINARI. Do you know whether anybody, whether the onsite coordinator or anybody else from EPA, looked at those manifests at all?

Mr. BOCK. I do not know that with certainty, but I would expect that in their routine oversight of the project, that they would at some point have done that.

Mr. MOLINARI. I would have expected so, too. But I am rather suspicious that they perhaps didn't do it, because the testimony we received indicated that they wouldn't have known about it until they received the monthly statement. Maybe I am being unfair the way I characterize it.

Mr. BOCK. Sure.

Mr. MOLINARI. Do you know of your own knowledge whether any of those manifests were checked at the site?

Mr. BOCK. Again, I don't know with certainty. It would seem that at some point during the project or maybe several points during the project they were looked at. But I can't tell you that with certainty.

Mr. MOLINARI. Were there any questions raised to you or your subordinates that you know of concerning the manifest, the material that was listed in the manifest?

Mr. BOCK. With respect to questions, I can't think of any. Can you be more precise?

Mr. MOLINARI. I don't know of any. I am just asking the question whether——

Mr. BOCK. Nothing comes to mind about that.

Mr. MOLINARI. It seems to me if somebody is checking the manifest as they should, and you have a daily shipment going out, that somebody looking at those sooner or later would ask some questions. And that is all I am asking: whether you recall.

Mr. BOCK. I don't know if that occurred, and I never heard anyone ask that question of me specifically.

Mr. MOLINARI. I wouldn't be surprised if they never checked. Just an observation. I am sure it's not something you could answer.

Let me ask you a question with respect to phase I as we know it—or let's put it in different terms: Your contract, your contract with the 24 settlers, including your own subsidiary corporation, is your work completed at this point in time?

Mr. BOCK. All of the work on the site, all that was required for us to perform at the site, is completed. The sole remaining issue at this point is the disposal of the remaining PCB's that I indicated are in storage currently at ML.

Mr. MOLINARI. Nothing else that is to be completed?

Mr. BOCK. EPA had written a letter to us in response to us notifying them that we had completed the project. And they came back with four things that they felt needed to be completed. One of those items was a broken water line that had led into the lagoon, which has been repaired, and EPA has been so notified.

Second, there were some outstanding manifests that they had not received copies of. They have now received those copies.

The third issue was QA/QC—quality assurance/quality control—documents from the project. And we hand delivered to them two large boxfuls. So that has been completed. So the sole remaining issue is the ultimate final disposal of PCB's being stored at ML.

Mr. MOLINARI. What is holding up the incineration of those 127,000?

Mr. DIVER. At the moment, the lack of a permit for the shipment to *Vulcanus.*

Mr. BOCK. Interestingly enough, you mentioned earlier the preference of the generators to incineration, let me assure you that it is additionally our preference to incinerate, and we have invested several million dollars in a couple of incinerator ships to in fact accomplish that. Thus far, however, without having the permits, it is difficult to fulfill our desires.

Mr. MOLINARI. It is my understanding that you had incineration facilities available at ML other than the *Vulcanus.*

Mr. BOCK. That's correct.

Mr. MOLINARI. Well, then why is it *Vulcanus* is holding up the incineration if you have alternative methods of incineration?

Mr. BOCK. You have to have—well, let me kind of go through that.

Mr. DIVER. The incineration unit that exists at ML, in our judgment, should not be utilized to burn the type of materials that we receive from Seymour.

Mr. MOLINARI. And PCB's?

Mr. DIVER. Well, yes. The problem was that they were sent to ML not as PCB's that required incineration. They did not, because they had less than 500 parts per million PCB's. They could have been solidified at ML perfectly within the regulations, but they were not. They were put in tanks and have since been intermixed with material which was over 500 parts per million and consequently is considered to be that. The incinerator that is at the site cannot be utilized for that purpose, because it is not a permanent EPA PCB incinerator.

Mr. MOLINARI. Does it get the temperature required? Why would it not qualify?

Mr. DIVER. Why would it not qualify? I don't know. Technically, I don't know. I don't know whether it's time, temperature, or what.

Mr. MOLINARI. I mean have they ever disposed of PCB's by incineration at ML?

Mr. BOCK. Not at ML, no.

Mr. MOLINARI. The question that I am interested in that I think can help us all in the future is: You apparently have many times acquired ongoing sites, and we know that that can be a very tricky thing. Now, you people obviously have a great deal more expertise than most of those in the field. For that reason I am trying to determine how do you evaluate the soundness of acquiring an ongoing site? How do you know, for example, that you are not going to acquire something and then be stuck with an enormous headache and have more problems later on because a disposal landfill, for example, that tended to be impermeable might actually have cracks in it and whatnot. How do you handle that?

Mr. DIVER. You can never know for certainty what is done in any given circumstances. A business judgment is applied to a combination of the empirical data. We are able to determine analytically or by observation from evaluating a particular facility together with the contractual warranties and representations that relate to the particular facility and make a judgment whether all in all we think it is a good business risk.

But we have as well had circumstances in which the business risk judgment that was undertaken subsequently proved to have been bad.

Mr. MOLINARI. Do you do any drilling testing?

Mr. DIVER. Generally, we do not do it, but we rely on the data that is generated by a particular facility. But we also go to the regulatory agencies that are involved and ask them what they think of the facility, what they think of the ground water data, for example, whether they think it is a well-run facility or slovenly run facility.

Mr. MOLINARI. Do you regularly—for example, EPA is one you go to?

Mr. DIVER. EPA is one that we go to as well as the State regulatory agencies, but primarily State agencies because they are generally closer to the sites.

Mr. MOLINARI. I would like to just touch for a moment on the excavation work that you performed in soil removal. And as I understand it, part of your contract provided for excavation identification, packaging, and removal of soil on the tanks and drums down to 1 foot below grade. Additional excavation identification, packaging, and removal of contaminated soil other than that which is on the tanks and drums down to 1 foot below grade.

As I understand that, wherever there were tanks and drums, you automatically excavated to a level of 1 foot below. Is that correct?

Mr. BOCK. That is correct.

Mr. MOLINARI. And where there were not drums, if there were visible contamination, then you would take it down 1 foot.

Mr. BOCK. That is correct. If I can elaborate for just a second how that was determined. That was determined at the outset of the project and agreed to by USEPA. And it was done on the basis of an aerial photograph which showed where the drums were located invisibly, where the contaminated soil was prior to us coming on to the site. Over that aerial photograph we then had a cross-section view showing precisely what areas of soil would be removed. Since that was the last step virtually in the cleanup process, we started out at least knowing what areas would be removed down to the depth of 1 foot.

Mr. MOLINARI. Now the question I have is, wasn't the soil mostly of sandy substance?

Mr. BOCK. I am not sure that I can really characterize the soil. You know, again I was not that close to the project at the time they were doing the excavating and so forth, and I am not qualified as a geologist to give you some kind of a description of the soil quality.

Mr. MOLINARI. Well, the question comes to my mind is your legal obligation ended when you hit 12 inches below that point, regardless of the potential of possible contamination lower than 1 foot below surface.

Mr. BOCK. Correct.

Mr. MOLINARI. And I assume that you fulfilled your legal obligation?

Mr. BOCK. Yes, we did.

Mr. MOLINARI. Now, I also would assume—and maybe mistakenly, if so correct me—that there would be other areas where there is good permeability of the soil because much of the soil is sandy. So that it seems that the absorption process would be rather quick and that there would be areas below 1 foot where you would have contaminated soil.

Mr. BOCK. That potential exists. Again, I don't know the subsurface strata or the nature of the soil. If that were the case, then that potential would exist. Sure.

Mr. MOLINARI. So let me ask you this. Have you done any work on phase II? Are you preparing estimates? Has anybody contacted you with respect to doing phase II work?

Mr. BOCK. We have provided a proposal to Monsanto for a ground water study from which would come a specific proposal. I believe, as indicated yesterday, they have selected another contractor who is either in the process or was about to start a summer study for them.

Mr. MOLINARI. OK. Then after the studies are completed, you will possibly submit a bid for that phase II work?

Mr. BOCK. Correct.

Mr. MOLINARI. If there was evidence of contamination after you go through taking 12 inches of soil, did your company go any deeper than 1 foot or only just simply stop at that 1-foot level because that is all you are contractually obligated to do?

Mr. BOCK. Right; at that depth is where we stopped. I am certain that in excavating material there were some errors made. We took out 13 inches, 15 inches, something like that. But at the 1-foot depth is where we stopped.

Mr. MOLINARI. Do you have any notice of any contaminated soil that exists at the site now since your cleanup is essentially completed?

Mr. BOCK. Any notice?

Mr. MOLINARI. Yes; when you go to the site and you have gone down 1 foot on 58 percent of the land area, down to a depth of 12 inches, where you can finish that work, is there any evidence that there is visible contamination still existing on site?

Mr. BOCK. I don't know the answer to that because I was not there again when they were physically excavating.

Mr. DIVER. Correct me, Ray, the site, since then that 1 foot has been replaced with clean soil.

Mr. BOCK. Right.

Mr. MOLINARI. I am asking the question because if there was anything visible at the time and you have put 1 foot of clean soil on top, it is no longer visible.

Mr. DIVER. True.

Mr. MOLINARI. So I have a very deep concern, and I think everybody should, that after you have finished your contractual obligation—and understand, I am not suggesting that you should have gone any farther; you had a legal contract and I wouldn't expect you to do anything more except perhaps where you did notice that there was further contamination after you fulfilled your legal obligation. And I think you have an obligation, maybe not legal, but an obligation to come forward to the Environmental Protection Agency and maybe the other settlers and say, "Hey, there is still contamination existing at a certain area."

I couldn't for the life of me believe that any responsible corporation, for example, would have gone forward and put a foot of clean soil on top and essentially obscured a visibly contaminated spot.

Mr. DIVER. That may very well have been done, Congressman.

Mr. MOLINARI. We are talking about something very important here.

Mr. DIVER. I understand it is important, and indeed it is another reason why the necessity for an onseen person from USEPA is really very important, to make sure that there is somebody there who can observe those kinds of things.

Mr. MOLINARI. Well, you know, I think they have the primary obligation, there is no question about that.

Mr. BOCK. Mr. Congressman, I would like to add something to that.

Mr. MOLINARI. Yes.

Mr. BOCK. First of all, in our negotiations with EPA we made the recommendation to them that they do not put clean fill back on top. That was rejected. Second——

Mr. MOLINARI. When was that recommendation made?

Mr. BOCK. I can't give you the specific timeframe. August, September, June to August-September 1982. Sometime in that timeframe before——

Mr. MOLINARI. Before you started the——

Mr. BOCK. Right before the consent decree was even finalized, we made that suggestion.

Mr. MOLINARI. OK.

Mr. BOCK. Additionally, in midstream of working on the project, it was suggested to EPA that possibly we take off additional soil in lieu of putting a cap back on the facility. That, too, was rejected.

Mr. MOLINARI. That is very interesting. And to me, at first blush that would seem to make a great deal more sense than to put topsoil on a potentially contaminated area thereby making it more difficult to determine if there is a hazard.

For the record, would you mind telling us who it was at EPA that you had these discussions with?

Mr. BOCK. I do not know the name. I did not have those discussions directly. I am taking that information from some notes of our people that I recall reading preparing for testimony today, and I don't recall having seen names of people that they talked to.

Mr. MOLINARI. All right. Would you supply a copy of those notes so that we can determine who they were? I think we would like to speak to people at EPA making that decision or on the advisability of the decision and why they did it.

Let's just go back to phase II. Is it conceivable, in the light of what we have been talking about, that whoever gets the cleanup work for phase II may find themselves in a position where they are going to be taking additional soil from the site?

Mr. BOCK. That may happen.

Mr. MOLINARI. Now, you are going to be bidding on the site. How do you determine from your own perspective the financial feasibility of doing such work? How do you now know if, for example, the contract provided that any and all contaminated soil must be removed? Is it a testing technique?

Mr. DIVER. That indeed is the great difficulty with the current Superfund Program, such that a contractor bidding cannot bid on the basis of a performance spec, cannot say, "I will get it to this specific level of cleanliness, and here are 180 contaminants and this is the concentration that must be left behind," because he has no way of knowing going in how much of that contaminated material there may be, how deep he will have to dig until he can get to it.

So the contractor is in the situation where he has to say, "Give me an objective standard, quantum. Either tell me I have to remove the top foot of soil, the top ten feet of soil, the top thirty feet of soil, or tell me that I have got to remove so many tons of soil." But there has got to be something absolute given to a bidder in that situation. There is no other way really for him to make a bid.

Mr. MOLINARI. I would like to for the record spell out why I am so concerned about this aspect of it. We heard yesterday from Dr. Chu, who represented General Motors, who in his sworn testimony states that,

> Since the site has now been cleared of all wastes and of visibly contaminated soils, it is my professional judgment that continued groundwater monitoring at the site will most likely show no significant contamination.

Now, he wasn't responsible for the removal of the soil, and yet he is making that conclusory statement that the site has been cleared of all waste and visibly contaminated soil. Now, I don't know in retrospect what he meant by "visibly," visibly now that it has been covered up with this 1 foot of clean soil, or if they had followed your suggestions and not covered that up. It may be from what I have heard today that there would have been more visibly contaminated soil.

You performed your contract, and it seems to me common sense would have dictated that they should have stopped at that point and taken a good look at what was left and not forced you, as you indicated they did, to come in with a foot of clean fill, clean soil, and bury what is underneath, thus making the job of determining whether there is further contamination of the soil so much more impossible.

Mr. DIVER. To the extent that it is visually apparent.

Mr. MOLINARI. I will pass back to you, Mr. Chairman.

Mr. LEVITAS. Thank you, Mr. Molinari.

Before I start my questioning, my recollection is that OTA's testimony suggested very strongly that given the conditions that existed on the surface and what was detected by original studies and some monitoring, that the contaminants that were in the soil are still there, and as it rains and water gets down into the soil, it is simply pushing it farther down.

I understood that you had done some work for Cummins Engines and IBM in 1980.

Mr. DIVER. Correct.

Mr. BOCK. Correct.

Mr. LEVITAS. At the Seymour site. You removed about 2,000 drums, as I recall.

Mr. DIVER. Correct.

Mr. LEVITAS. What was done with that material that you removed?

Mr. BOCK. The majority of that material, if not all—and I don't know precisely how much, but it was the vast majority, as I recall—it was brought to our facility in Calumet City, IL, where it was staged. And from that point it was shipped to El Dorado, AR, and incinerated, a facility not owned by us but a facility that had a contractual relationship with IBM.

Mr. LEVITAS. The incineration that occurred in El Dorado was in a facility owned by what firm?

Mr. BOCK. The name of the firm is ENSCO—E-n-s-c-o—and is an acronym for a longer company name that I can't recall.

Mr. LEVITAS. And when you said it was staged at your facility, I don't know what "staging" means. What does it mean?

Mr. BOCK. Well, we brought it from the Seymour facility to our location, which in effect was a transfer location in Calumet City, and then repackaged on vehicles to go to the facility. And it ended up the work was performed on that material at that point, too.

Mr. LEVITAS. Let me go back to the *Vulcanus* situation. I think Mr. Molinari has touched on part of it, but there were a couple of things that I didn't understand.

As I recall, there have been two test burns on the *Vulcanus*, one under a permit that was issued for research purposes and for those two burns. Was that the only permit that has been issued for *Vulcanus I*?

Mr. DIVER. From the U.S. Environmental Protection Agency in recent years, yes.

Mr. LEVITAS. Do you have a copy of that permit?

Mr. DIVER. No; I don't. I am sorry. Research permit?

Mr. LEVITAS. Yes.

Mr. DIVER. We will supply it.

Mr. LEVITAS. Thank you.

[Information received from Mr. Diver follows:]

Permit No. 81-002

ENVIRONMENTAL PROTECTION AGENCY

Ocean Dumping Permit Program

Marine Protection, Research, and Sanctuaries Act

Notice of Change in Permit Expiration Date

Notice is hereby given that the U.S. Environmental Protection Agency has suspended the operation of permit Hq 81-002 and extended its expiration date by 46 days. Under the Marine Protection, Research, and Sanctuaries Act of 1972, the Agency issued to Chemical Waste Management, Inc. of Oak Brook, Illinois, and Ocean Combustion Service, Rotterdam, the Netherlands, an October 23, 1981, a permit for incineration at sea of PCB wastes onboard the M/T VULCANUS. The Permittees had been granted an 85-day suspension in the permit term in order for the M/T VULCANUS to return to Europe to fulfill contractual committments. The Agency granted this request and correspondingly, the expiration date became August 28, 1982. The extension did not change any other of the permit requirements, including type and quality of the waste to be incinerated, or monitoring requirements. The Agency now has decided to require a different stack gas monitoring system for the next PCB burn. During the period from June 21 until August 6, 1982, when EPA was evaluating the results of the test burn and when the new sampling train is being installed on the Vulcanus, the permit is not considered to be in effect and the effective expiration date of the permit is extended correspondingly. The new expiration date is October 12, 1982, reflecting an effective 46-day suspension in the permit due to additional time required in evaluating data from the first burn and in stalling the new sampling system. For further information, contact Mr. Steven Schatzow, EPA, Washington, D.C. 20460, 202/382-5400.

MARINE PROTECTION, RESEARCH, AND SANCTUARIES ACT (INCINERATION AT SEA) PERMIT

Permit Number and Type:		HQ-81-002 Research
Effective date:		This permit shall go into effect 20 days after written notification of intent to load the M/T VULCANUS for ocean incineration
Expiration date:		6 months from the effective date.
Permittees:	(1)	Chemical Waste Management, Inc. 3003 Butterfield Road Oak Brook, Illinois 60521 and its subsidiary
	(2)	Ocean Combustion Service B.V. Noordsingel 199 B Post Box 171 3000 AD Rotterdam The Netherlands,
Material generators:	(1)	General Electric Company Apparatus Service Division 1040 East Erie Avenue Philadelphia, Pennsylvania 19124
	(2)	U.S. Government Agencies: General Services Administration US Coast Guard EPA, Region III Department of Defense
	(3)	U.S. Utility Companies
	(4)	Other U.S. chemical manufacturers, distributors, other equipment manufacturers, and users that are required under the Toxic Substances Control Act regulations to dispose of polychlorinated biphenyls in accordance with the above Act.
Material Transporter:		Ocean Combustion Service B.V. of Rotterdam, the Netherlands
Name of Conveyance:		M/T VULCANUS
Point of departure:		Mobile, Alabama

This permit authorizes Ocean Combustion Service, B.V. (OCS) and Chemical Waste Management, Inc., (CWM) hereafter referred to as "Permittees", to transport for incineration in compliance with the Marine Protection, Research, and Sanctuaries Act of 1972, as amended, hereafter referred to as "the Act", material in accordance with the following general and special conditions:

General Conditions

1. All transportation and dumping authorized herein shall at all times be undertaken in a manner consistent with the terms and conditions of this Permit. The Permittees shall be liable for compliance with all terms and conditions. The liability is set forth in General Condition #2. Compliance by the Permittees with one or more, but less than all of the conditions with which the Permittees must comply, will not constitute a ground or grounds of defense in any proceeding against the Permittees for violation of the provisions of this Permit.

2. Any person who violates any provision of the Act, the Final Regulations issued thereunder, or any term or condition of this Permit shall be liable for a civil penalty of not more than $50,000 for each violation.

3. Transportation to, and incineration at any location other than that authorized by this Permit, unless specifically authorized by a written modification hereto, shall constitute a violation of the Act and the terms and conditions of this Permit.

Transportation and incineration of any material more frequently than, or in excess of, that identified and authorized by this permit, or incineration of material not authorized by this permit, unless specifically authorized by a written modification hereto, shall constitute a violation of the Act and the terms and conditions of this Permit.

4. Nothing contained herein shall be deemed to authorize, in any way, the transportation for the purpose of disposal into ocean waters, the following materials:

a. High-level radioactive wastes;

b. Material, in whatever form, produced for radiological, chemical, or biological warfare;

c. Persistent synthetic or natural material which may float or remain in suspension in the ocean.

5. After notice and opportunity for a hearing, this Permit may be modified or revoked, in whole or in part, during its term for cause including, but not limited to, the following:

a. Violation of any term or condition of this Permit;

b. Misrepresentation, inaccuracy or failure by the applicant to disclose all relevant facts in the permit application;

c. A change in any condition or material fact upon which this permit is based that requires either a temporary or permanent reduction or elimination of the authorized transportation or incineration including, but not limited to, changes in conditions at the designated site, and newly discovered scientific data relative to the granting of this Permit;

d. Failure to keep records, to engage in monitoring activities, or to notify appropriate officials in a timely manner of transportation and incineration activities as specified in any condition of this Permit.

6. This Permit shall be subject to suspension by the Assistant Administrator for Water or his delegate if he determines that the permitted incineration has resulted, or is resulting in imminent and substantial harm to human health or welfare or the marine environment.

7. If material which is regulated in this Permit is discharged due to an emergency to safeguard life at sea in a location or in a manner not in full accordance with the terms of this Permit, Ocean Combustion Service B.V. shall make a full report, in accordance with 18 U.S.C. 1001, within 10 days to the Assistant Administrant for Water detailing the conditions of this emergency and the actions taken. This report shall be in addition to notification by radio, telephone, or telegraph to the Assistant Administrator for Water and the appropriate U.S. Coast Guard District of the incident immediately and in accordance with 40 C.F.R. Section 224.2 (b).

8. Unless otherwise provided for herein, all terms used in this Permit shall have the meanings assigned to them by the Act or the Final Regulations published thereunder.

9. The issuance of this Permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of rights, nor any infringement of Federal, State or local laws or regulations, nor does it obviate the necessity of obtaining State or local assent required by applicable law for the activity authorized.

a. This permit is conditioned on the Permittees' assuring compliance with all applicable requirements for collection, transportation and storage of PCB's, specifically under Part 761 of the Toxic Substances Control Act.

b. This permit is also conditioned on the Permittees' compliance with all applicable Federal or State requirements under the Resource Conservation and Recovery Act.

10. This permit does not authorize or approve the construction of any offshore physical structures or facilities or, except as authorized by this permit, the undertaking of any work in any navigable water.

11. The Permittees shall at all times maintain in good working order and operate efficiently as possible all facilities, including vessels, used by the Permittees in achieving compliance with the terms and conditions of this permit.

12. This Permit, or a true copy thereof, shall be placed in a conspicuous place on the vessel which will be used for the transportation and incineration authorized by this Permit.

13. The incinerator vessel shall have its name and number distinctly legible at all times.

14. The Permittees shall allow the Assistant Administrator for Water, the U.S. Coast Guard Commandant, and/or their authorized representatives, upon presentation of credentials:

a. To enter into, upon or through the Permittees' premises, vessels, or other premises or vessels under the control of the Permittees, where, or in which, a source of material to be transported is located or in which any records are required to be kept under the terms and conditions of this Permit or the Act;

b. To have access to and copy any records required to be kept under the terms and conditions of this Permit or the Act;

c. To inspect any monitoring equipment or monitoring method required in this Permit;

d. To sample or require that a sample be drawn under EPA or Coast Guard supervision of any material incinerated or to be incinerated;

e. To inspect any incineration or navigation equipment installed on board the incineration vessel authorized to incinerate at sea under this Permit; and

f. To take other such action as is necessary or appropriate to determine whether the terms and conditions of this permit have been fulfilled.

Special Conditions

1. Permit term - this Permit shall be in effect 6 months from the effective date of the permit.

2. Description of Material

a. The waste to be transported for incineration is a mixture of polychlorinated biphenyls and rinsate which shall be diesel fuel. The PCB waste shall not differ significantly from that set forth in Appendix A.

b. The character of the material being incinerated shall not be altered in its content from the proportions listed in Appendix A or by the addition of wastes from sources other than those identified above.

c. The specific source and amount from each source of the waste materials to be incinerated in each burn must be reported to the Assistant Administrator for Water 10 working days prior to loading the vessel with that specific batch of waste.

3. Amount of Material -

a. The Permittees are authorized to transport and incinerate material described in Special Condition No. 2 in an amount not in excess of 3.6 million gallons.

b. The Permittees shall submit reports of actual volumes incinerated within 10 days after each incineration cruise.

c. Destruction efficiency for PCB's shall be calculated. Within the detection limits of available equipment, the destruction efficiency also will be calculated for the PCDF's. These values shall be reported within 45 days of the completion of each cruise.

4. Transportation and Barging Activities -

a. The port of departure for the incineration of the material described herein shall be Mobile, Alabama.

b. During loading operations, transport, and incineration at sea, there shall be no loss of material to any waterway or ocean waters.

c. Reports, approval forms, copies of any survey reports, and copies of this permit and safety plan shall be kept on the M/T VULCANUS.

5. Disposal Site - Transportation for the purpose of this Permit shall terminate at, and all waste incineration shall be confined to the area described below:

Gulf Incineration Site

Latitude	Longitude
26° 20'00"N	93° 20'00"W
26° 20'00"N	94° 00'00"W
27° 00'00"N	93° 20'00"W
27° 00'00"N	94° 00'00"W

The Permittees shall navigate around, by a radius of at least 15 nautical miles, the reefs found at the following coordinates:

West Flower Gardens:

93°48'W 27°15'N

East Flower Gardens:

27°55'N 93°36'W

The permittees shall also navigate around, by a radius of at least 5 nautical miles, the reefs found at the following coordinates:

Claypile Bank

28°20'N 94°09'W

Stetson Bank

28°10'N 94°18'W

6. Method of Disposal

a. The M/T VULCANUS shall be used for incineration at sea of the material described above.

b. During start-up, PCB's shall not be fed into the incinerators until a wall temperature of 1200°C has been reached in the furnace, and only one burner at a time may be changed over to the waste.

c. During tank changeover, prior to each subsequent tank depletion, the ship shall be underway and oriented in such a direction as to minimize plume impingement should incinerator flame be extinguished. At least 15 minutes before tank depletion, pumping shall be switched so that 2 burners of each incinerator shall be fed from a full tank, with the remaining burner used to deplete the material in the emptied tank.

d. The speed and direction of the M/T VULCANUS during waste incineration shall be controlled in such a manner to prevent incinerator plume contact with the ship.

e. The incinerator wall temperature shall be greater than 1200°C and the mean residence time shall be greater than 0.7 second at that temperature.

f. An automatic shut-off device shall be in operation on both furnaces, set to turn off the flow of PCB waste if the wall temperature falls below 1200°C; or if the flame is extinguished.

g. The combustion efficiency of the incinerator during the incineration will be at least 99.9 per cent complete. If the combustion efficiency level falls below 99.9 per cent, the waste feed on the M/T VULCANUS shall be shut down immediately until corrective measures which assure 99.95±0.05 per cent combustion efficiency are applied.

h. Tank washings and pump-room bilges contaminated with wastes shall be incinerated at sea in accordance with these regulations or discharged to port facilities.

i. Residues remaining in the incinerator shall not be dumped at sea.

j. There shall be no black smoke nor extension of the flame above the plane of the stack.

7. Monitoring Requirements -

a. Continuous monitoring of CO, CO_2, O_2, wall temperature, and combustion efficiency, shall be in effect during the entire operation.

b. The operational controls and monitoring panels shall be manned at all times by a responsible individual to insure the incinerators are operating at the 99.95±0.05% minimum combustion efficiency.

c. A device for addition of ammonia to make a visible plume shall be installed and operable.

d. An automatic sealed monitoring device ("black box") will be installed to record CO, CO_2 and O_2 and wall temperatures and a camera mounted so as to photograph the control panel every 15 minutes.

e. An hourly manual log will also be kept, including, but not limited to:

(1) Time, date;

(2) "Black box" wall temperature and CO, CO_2 and O_2 and calculated combustion efficiency;

(3) Controller temperature reading;

(4) Waste feed rates, and tank from which waste is taken;

(5) Wind speed and direction;

(6) Vessel position by appropriate navigational means; vessel course and speed.

f. The manual log will also be kept during tank changeover.

g. Calibration of instruments measuring CO, CO_2, O_2 shall be made with standard mixtures brought on board the M/T VULCANUS for that purpose.

8. Safety Requirements -

The safety of all shipboard personnel will have top priority during the incineration of PCB wastes on board the M/T VULCANUS. As a minimum the following safety precautions are required as they apply before, during, and after burn operations. These safety precautions are grouped by participating organizations to define and emphasize areas of responsibility.

a. M/T VULCANUS

(1) The tank system shall be maintained such that escape of vapors into the atmosphere is minimized.

(2) Any PCB waste spills, leaks or residuals detected shall be immediately contained, and the area restricted until decontamination is completed.

(3) Whenever the piping system has to be opened for repairs or placement, the part of the system to be repaired shall be flushed for at least 3 minutes with fuel oil whenever possible.

(4) The M/T VULCANUS should demonstrate the ability to remain in constant 24-hour communication with the 8th District Coast Guard, New Orleans, Louisiana by voice and code, using frequencies and channels appropriate to the area and to the conditions of transmission and reception. This requirement supplements but is not intended to supersede or replace the existing communication equipment. Daily communication with the 8th District Coast Guard shall be required reporting burn progress and conditions. Emergency conditions shall be reported as soon as possible to the 8th District Coast Guard. The M/T VULCANUS shall reply promptly to radio calls at all times during the incineration.

(5) The Master of the M/T VULCANUS shall give a briefing to non-crew personnel on ship safety procedures and regulations. This shall include, but not be limited to, the assignment of lifeboats and a lifeboat drill.

(6) Appropriate first aid supplies shall be available on board the M/T VULCANUS to respond to emergency situations.

(7) The M/T VULCANUS must comply with all applicable United States Coast Guard rules and regulations governing a ship of this class and specifications.

b. Ocean Combustion Service and Chemical Waste Management

(1) Appropriate first aid and medical supplies and trained medical personnel shall be available to respond to emergency situations on board the M/T VULCANUS.

(2) On board the M/T VULCANUS, the Safety Plan for Incineration of PCB Wastes at Sea (Appendix B) will be in effect for all personnel on the vessel.

(3) Reports of accidents, emergencies, equipment malfunction, plume impingement, or personnel injury or exposure shall be reported immediately by radio communcations to the 8th Coast Guard District on shore, for subsequent relay to other concerned units. In the event of significant personnel injury or exposure, an OCS or CWM representative shall consult with the ship's master and the designated safety officer to assure compliance with evacuation procedures. Upon return of the M/T VULCANUS to the shore, a complete report of the incident shall be submitted to the 8th District Coast Guard and copies transmitted to all concerned authorities.

9. Research Plan -

a. The safety requirements, monitoring, and criteria for termination of a burn are contained in the Safety Plan for Incineration of PCB Wastes at Sea, Appendix B.

b. All information obtained by or through this research project shall be part of the public domain. Results of CO_2, CO, O_2, combustion efficiency and wall temperature for each separate burn shall be made available to EPA Headquarters within 10 working days after termination of each burn. Successive burns shall be contingent on successful demonstration of a combustion efficiency greater than 99.9% in the previous burn.

c. An EPA Representative may accompany the Permittees on the VULCANUS or any vessel(s) or aircraft(s) used in connection with any of the incineration cruises or burns permitted herein. Quarters and subsistence for the EPA representative while on board shall be provided for and shall be at the expense of the Permittees.

10. Notice to Regulatory Agencies -

a. The waste transporter shall provide telephone notification of sailing to the Captain of the Port (COTP), Mobile, at 205-690-2286 not later than twenty-four (24) hours prior to the estimated time of departure for the dumpsite designated in Special Condition No. 5. The waste transporter shall confirm the actual departure time, and shall immediately notify the COTP upon any change in the estimated time of departure greater than one (1) hour.

b. The following information shall be provided in the notification of sailing:

1. Permit number;

2. Name of vessel;

3. Name of transporter;

4. Description of the vessel contents, including volume;

5. Place of departure;

6. Location of the incineration site;

7. The time of departure;

8. Estimated time of arrival at the incineration site;

9. Estimated time of departure from the incineration site;

10. Estimated time of return to port.

c. The waste transporter shall maintain the following information with regard to Special Conditions Nos. 9(a) 9(b) and 9(c):

1. Permit number;

2. Name of person contacted;

3. Time of contact;

4. Confirmation Code;

5. Other pertinent information, requested by the Coast Guard or EPA.

10. Reports and Correspondence -

All reports, data, and related correspondence required in Special Conditions Nos. 2, 3,4,6,7,8,9 and 10 shall be submitted to the following address:

US Environmental Protection Agnecy
401 M Street S.W.
Washington, D.C. 20460

Attn: Marine Protection Branch, WH-585

All reports required to be submitted by Special Conditions Nos. 8 and 10 to the U.S. Coast Guard shall be addressed as follows:

Commander M
8th Coast Guard District
Hale Boggs Federal Building
500 Camp St.
New Orleans, Louisiana 70130

APPENDIX A

CHARACTERISTICS OF THE MATERIAL TO BE INCINERATED

1. Physical description before incineration

The physical properties of the material to be incinerated are as follows:

Transportation temperature:	Ambient
Specific gravity of the liquid at 20°C:	0.9-1.5
Boiling point range:	65-390°C
Pour point:	greater than or equal to 10°C
Vapor pressure:	25°C 0.006 Torr to 75 Torr
	150°C 4.3 Torr to 200 Torr
	200°C 29.0 Torr to 450 Torr
Saybolt Viscosity:	100°F 1800-2500
	130°F 260-340
	200°F 44-48
Coefficient of thermal expansion:	0.00066 cc/cc/°C
Solubility in water:	0.09 mg/L
BTU/lb:	5,400 - 12,000
Molecular weight:	180-500

2. General Chemical description before incineration

Trichlorobenzene, kerosene, pump oils, PCB's, and other organic components. Trace metal contaminants measured: at the lower detection limit of 1 ppm: Cu, Fe, Al, Zn; and others at the lower detection limit of 5 ppm: Cr, Pb, Ni, Mn and Ag. Sulphur may be present up to 250 ppm.

3. After incineration

CO_2, H_2O, and HCL as gases and trace metal particulates.

4. The quantity of material to be incinerated may be up to 3.6 million gallons.

42-590 O—85——89

Appendix B

Safety Plan for the Incineration of PCB Wastes at Sea
TABLE OF CONTENTS

Page

1. Purpose and scope 15
2. Potential hazards 16
3. Termination of a burn 17
4. Personnel protective equipment 18
5. Personal hygiene 18
6. Safety procedures and monitoring 21
Appendix C, Criteria for Termination of a Burn 25

References 24

Appendix D, First Aid 26

1. PURPOSE AND SCOPE

The purpose of this document is to define a plan to insure the safety of personnel participating in the incineration of PCB wastes on board the M/T VULCANUS. All personnel on board ship will adhere to the provisions of this plan during all phases of all anticipated incineration burns. Organisatie voor Toegepast-Natuurwetenschappelijk Onderzoek (TNO) will brief officers and crew members of the VULCANUS with this safety plan data and procedures. This is particularly important with regard to personal hygiene, equipment malfunctions, spills, and criteria for terminating a given burn. Due to the inherent confinement while at sea, and required interaction of EPA*, TNO and VULCANUS personnel, a thorough understanding of the contents of this document is mandatory on the part of all concerned.

The scope of the safety plan is limited to shipboard operations. Specifically excluded are the safety requirements for ship loading operations, which are covered by USCG and OCS standard procedures.

To assist in establishing and maintaining safety procedures and routines, TNO will designate a safety officer for ocean incineration operations. His duties will include: safety procedure briefing of all ship's personnel; monitoring the implementation of this safety plan; advising the ship's master regarding corrective action for unsafe conditions or incidents.

*Any time in the plan when EPA is mentioned, only duly authorized representatives are meant.

2. POTENTIAL HAZARDS

The PCB wastes to be incinerated are liquids consisting of a mixture of polychlorinated biphenyls (PCB's), partly diluted with kerosene.

Much of the toxicological information on the substances mentioned is given in reference 1. See also ref. 2.

PCB's are nonvolatile substances, rapidly taken up through the skin and accumulated in the body. The 50% lethal dose (LD 50, oral) for rats is on the order of grams per kg bodyweight. The TLV (Threshold Limit Value) for PCB's in the ship's air must not be higher than 0.05 micrograms/m^3.

The permissible exposure level for airborne Aroclor 1254,* the principle PCB component in these wastes is 0.5 micrograms/m^3. Applying the 10% safety factor used in the Herbicide Orange Safety Plan, the ceiling concentration in the atmosphere aboard the M/T VULCANUS became 0.05 micrograms/m^3.

PCB wastes may be contaminated with toxic polychlorinated dibenzofuranes (PCDF's). One of the PCDF's, tetrachloro-dibenzofurane (TCDF), has been found to be embryotoxic, teratogenic, acnegenic, and the lethal doses are very small. The concentration of PCDF's are expected to be less than effect dose. This expectation will be fulfilled if the plume never strikes the ship and the combustion efficiency does not drop below 99.9% during incineration.

*Table Z-1 Occupational Safety and Health Administration, 29 CFR 1910.1000.

3. CRITERIA FOR TERMINATION OF A BURN

Due to the highly toxic nature of the PCDF contaminants possibly present in the PCB wastes and/or in the stack gases, the TNO safety officer shall, in consultation with the cognizant EPA representative and the ship's master, retain the authority to terminate and/or initiate incineration. The criteria that will be used to measure safe shipboard operation are discussed in the following sections. These criteria will only be used as guidelines. It should be recognized that, in addition to the TNO safety officer, authority to terminate any individual incineration burn shall also rest with any one of the following personnel: EPA designate and the master of the M/T VULCANUS.

3.1 Plume impingement

The plume arising from the incinerator stacks will be injected with ammonia as required to make it visible as necessary. Incineration of PCB wastes will be terminated and shipboard personnel will be withdrawn to a safe area if at any time during the test the plume is observed to remain on the deck of the M/T VULCANUS even after corrective measures have been attempted. The plume must be visible also at night, and the position of the plume relative to the ship must be known at all times on the bridge.

3.2 PCB waste spills

Incineration will be terminated if a spill occurs on board the M/T VULCANUS and cannot be readily contained or cleaned up.

3.3 Combustion efficiency

The CO and CO_2 levels determined at or near the exit plane will be used as an indication of overall combustion efficiency using the following equation:

$$\% \text{ Combustion Efficiency} = \frac{CO_2 \text{ concentration} - CO \text{ conc.}}{CO_2 \text{ concentration}} \times 100$$

Combustion efficiencies in excess of 99.9 per cent are deemed necessary as an indication that high destruction efficiencies for the PCB waste constituents may be anticipated. The combustion efficiency corresponds at 99.9% to approximately 100 ppm CO in the stack gas. Large amounts of CO in the stack gas is an indication that incomplete combustion is taking place in the incinerator. Incineration will be terminated if the combustion efficiency is less than 99.9%. The TNO safety officer must have access to the monitoring instruments at all times during incineration.

4. PERSONNEL PROTECTIVE EQUIPMENT

Due to the potential health hazard relating to the incineration of PCB wastes aboard the M/T VULCANUS, special safety requirements have been established for all personnel to ensure that no hazards exist. To assure adequate protection, issued coveralls shall be worn as appropriate as well as protective gloves, shoes and masks. In addition to the normal equipment used in this type of activity, the following items will be provided:

1. Approved pesticide gas respirators;
2. Fire extinguishers;
3. Fire Fighter Entry Suits;
4. Scott Air Pak;
5. Portable Emergency Eye Baths. At least two of these must also be present continuously in the pump room as well as in the burner room.

All personnel that will be on board the M/T VULCANUS and may enter a potentially contaminated area will be duly trained on the proper use and operation of the above equipment.

Other general safety requirements that will be adhered to are the following:

1. All personnel within the incinerator area and/or sampling area during the incineration of PCB wastes will have an approved gas mask available for immediate use.

2. If an emergency condition is detected, all personnel will be notified to don masks and to evacuate a given area if necessary.

3. Personnel exposed to high tempertures and/or direct thermal radiation will wear entry suits.

4. Confirmed or suspected spills will be reported to the ship's master and the TNO safety officer for proper clean up.

5. PERSONAL HYGIENE

The observed effects on animals of PCDF and PCB's probably containing PCDF are described in ref. 1. The effects observed on workers can be summarized below, to emphasize the need for stringent personal hygiene.

- o Chloracne (moderate to severe skin irritation, with swelling and hardening, blackheads, pustules and pimples)
- o Hyperpigmentation (skin discoloration)
- o Hirsutism
- o Eye irritation
- o Muscular pain (legs, arms, back, breast)
- o Decreased libido
- o Fatigue
- o Nervous irritability
- o Intolerance to cold
- o Destruction of nerve fibers and nerve sheaths

In addition, some effects on exposed test animals have been observed. These may be considered possible effects on the human system especially when the metabolism of the animal is similar to that of man. These effects include toxicity to embryos, birth defects, possible carcinogenicity, and even death.

The need for personal cleanliness is pointed up by the methods of entry of PCB's into the body. These are:

- o Through the mouth (ingestion)
- o Through the skin (percutaneous)
- o Through the lungs and eyes

Thus, eating, drinking, and smoking in working areas; wearing contaminated clothes; leaving liquids on the skin; failure to shower frequently and especially immediately after exposure; and breathing contaminated air must be avoided. Hands must be washed before and after going to the toilet. Smoking in a PCB contaminated atmosphere and smoking a PCB contaminated cigarette or cigar is highly dangerous and therefore forbidden. One shall never touch the floors or the soles of the shoes with bare hands.

In general, then, safety of ship's crew relates to the concepts of personal cleanliness, isolation of contaminated areas and preservation of 'clean' areas.

Good personal hygiene practices are of prime importance in preventing exposure of personnel to materials containing PCB's and/or PCDF. Of equal importance is the establishment of 'clean' areas, in which personnel can co-exist normally; the isolation of the hazard to areas where contamination is expected and can be dealt with; and the maintenance of an interface between the two areas which preserves the integrity of the clean area and the safety of personnel therein.

It is anticipated that the first opportunity for exposure will come from spills and leaks in the system. The exposed liquids will evaporate partly, especially from hot decks and tankage areas below decks, and the very hot combustion room, leaving PCB residues that are relatively nonvolatile.

The liquids may be tracked over the decks and passageways and may find their way into the eating and living quarters unless an inviolate interface is established between the two areas. The basic requirements for effective personnel hygiene against PCDF and PCB containing materials are:

- o Protection of personnel from vapor and liquid contact in the contaminated areas by source control and protective gear.
- o Provision of disposable clothing and foot covers.
- o Provision of disposal facilities at the interface region between the contaminated and clean areas.
- o Provision for shower, hand, face and eye-washing facilities at the interface region.
- o Provision of clean clothing and foot covering at the boundary of the clean area upon return to working areas.
- o Instruction in the use of the cleaning and protective equipment and in methods of personal cleansing.
- o Mandatory and enforced use of the above facilities and concepts.

Smoking, eating or drinking from containers or cups should be avoided in potentially contaminated areas. This also applies to personnel who have not showered or otherwise cleansed themselves after being in potentially contaminated areas. The living quarters must be cleaned daily and very thoroughly.

The pump room and the burner room are to be considered as contaminated areas. The number of people entering these rooms must be restricted to a minimum. There must be interface regions between these two rooms and the rest of the ship. When leaving these rooms, clothes and shoes must be changed and a shower must be taken before entering other parts of the ship. Hot and cold drinks, disposable cups, emergency eye baths and the opportunity for hand washing must be present in the burner room. Flashlights must always be present constantly in the burner room and in the pump room. They are only to be removed from these rooms for destruction by incineration.

The routes by which personnel move should be so arranged that entrance to the working area and exits from the working area are separate whenever possible. Disposable shoe covers must be provided at

entrances and they must be incinerated after use. The hourly watch rounds must be made in the following and not in any other order: from the burner room to the generator room to the pump room and back again to the burner room. The indoor floor on this route must be covered with heavy and renewable paper. It must be renewed regularly. The floor and the deck on this route must be cleaned daily or more often if necessary. One shall never go directly from the pump room and the burner room to the living quarters, mess room, galley, bridge, toilets and passage ways.

There must be a monitoring system based on wipe sampling and analysis on board to insure that clean areas remain so.

Finally, all working personnel shall be made aware of the need for good personal hygiene and of the consequences to themselves and others of poor personal cleanliness and poor housekeeping. A training program shall be developed and personnel, shall be trained in personal hygiene practices. The effectiveness of the program will depend on the degree to which personnel accept the training, willingly put the principles to use, and cooperate in preventing exposures. Personnel who are unwilling or unable to accept and apply the personal hygiene procedures should be excluded from contact with and entry to the working area by direction of the ship's master.

6. SAFETY PROCEDURES AND MONITORING

The safety of all shipboard personnel will have top priority during the incineration of PCB wastes on board the M/T VULCANUS. As a minimum the following safety precautions are required as they apply before, during and after burn operations. These safety precautions are grouped by participating organizations to define and emphasize areas of responsibility.

M/T VULCANUS Responsibilities

1. The tank system shall be maintained such that escapes of vapors into the atmosphere is minimized.

2. Any PCB waste spills, leaks or residuals detected shall be immediately contained and the area restricted until decontamination is completed.

3. Whenever the piping system has to be opened for repairs or replacements, the part of the system to be repaired shall be flushed for at least 3 minutes with oil whenever possible.

4. Fugitive PCB waste emissions from the waste pumping room or any other source shall be minimized.

5. An automatic shut-off device shall be in operation on both furnaces, set to turn off the flow of PCB wastes if temperature reading indicates the wall temperature drops below 1200°C.

6. The furnace may be brought up to operating temperature at a rate consistent with ship's practice and experience, using fuel oil. When a wall temperature of 1200°C has been reached in the furnace the feed stock may be switched over to PCB wastes. The practice of converting to PCB waste feed by putting furnaces on stream successively should be followed. The wall temperature of the furnace must be restored to at least the original level of 1200°C before the next burner is changed over to PCB waste.

7. During tank changeover, prior to each subsequent tank depletion, and any time prior to the time when any water or uncombustible liquid will be injected into the incinerator, the ship shall be underway and oriented in such a direction as to minimize plume impingement should incinerator flame be extinguished. At least 15 minutes before tank depletion, pumping shall be switched so that two burners of each incinerator shall be fed from a full tank, with the remaining burner used to deplete the material in the emptied tank.

8. Monitoring of the furnaces for temperature, and for completeness of combustion at all times.

9. The operational controls and monitoring panels shall be manned at all times by a responsible individual to insure the incinerators are operating within desired combustion parameters.

10. A device for addition of ammonia to make a visible plume shall be installed and operable.

11. The speed and direction of the M/T VULCANUS during waste incineration shall be controlled in such a manner to prevent incinerator plume contact with any part of the ship.

12. The VULCANUS shall demonstrate the ability to remain in constant 24-hour communication with 8th Coast Guard District, New Orleans, Louisiana by voice and by code, using frequencies and channel appropriate

to the area and to the conditions of transmission and reception. This requirement supplements but is not intended to supersede nor r place the existing communication equipment. Daily communication with the 8th Coast Guard District shall be required reporting test progress and conditions. Emergency conditions shall be reported as soon as possible.

13. The Master of the M/T Vulcanus shall give a briefing to all non-crew prsonnel on ship safety procedures and regulations. This shall include, but not be limited to, the assignment of lifeboat drill.

14. The M/T VULCANUS shall comply with all applicable United States Coast Guard (USCG) rules and regulations governing a ship of this class and specification.

15. Appropriate first aid supplies shall be available on board the M/T VULCANUS to respond to emergency situations.

TNO Responsibilities

1. Appropriate first aid and medical supplies and trained medical personnel shall be available on shore to respond to emergency situations on board M/T VULCANUS.

2. Monitoring of the incinerator stack gases for CO, CO_2 and O_2 shall be carried out by the TNO sampling/monitoring crew. The CO and CO_2 determinations shall be used to assure that the desired degree of combustion efficiency (99.9 5±0.05%) is achieved during the incineration.

3. Sampling the stack gases for the determination of PCB's and PCDF's, if any, shall be carried out by the TNO sampling/ monitoring crew. The levels in the stack gases shall be determined on completion of each burn. When samples are drawn for analysis of PCB's and PCDF's, the volumes shall be split before analysis and one portion adequately stored for future analysis by EPA or a laboratory approved by EPA, if required. There shall be a minimum of six samples taken at each wall temperature used to carry out incineration.

4. An on board air monitoring system for PCB's shall be operable.

5. An on board monitoring system for the detection of spills and leaks of PCB waste, based on the analysis of wipe samples, shall be operated.

6. A sampling system for locating the plume shall be established using HCL in the air on the ship as a tracer indicator. If levels of HCL reach 0.1 to 0.5 ppm, immediate corrective actions shall be taken

immediate withdrawal of personnel from areas with HCL concentrations equal to or in excess of 5 ppm is mandatory. Any location with positive results shall be recorded together with wind direction, wind speed.

7. Reports of significant incidents of equipment mulfunction, plume impingement, personnel injury or exposure shall be prepared and immediately reported by radio communications to the 8th Coast Guard District on shore, for subsequent relay to other concerned units. In the event of significant personnel injury or exposure, a EPA representative shall consult with the ship's master and the TNO safety officer to assure compliance with evacuation procedures. Upon return of the M/T VULCANUS to the shore a complete report of the incident shall be submitted to 8th Coast Guard District and copies transmitted to all concerned authorities.

TNO

8. The M/T VULCANUS crew and any other shipboard personnel boarding the M/T VULCANUS shall be briefed by medical personnel and the TNO safety officer.

9. The TNO safety officer shall, in close cooperation with the Ship's master, survey all safety measures and precautions on board the M/T VULCANUS.

10. A plan will be developed by Permittees and be available to cover emergency rescue or medical requirements of EPA, TNO and VULCANUS personnel during operation at sea.

REFERENCES

1. PCB POISONING AND POLLUTION
editor: K.Higuchi, 1976

2. SOME COMMENTS ON A MONITORING AND SAFETY PLAN FOR THE INCINERATION OF PCB CONTAINING WASTES AT SEA.
by H. Compaan, TNO, DELFT, HOLLAND, 25-10-1979; 4 pages.

3. Polychlorinated Biphenyls
Criteria and Standards Division
US EPA, Washington, DC

Appendix C

CRITERIA FOR THE TERMINATION OF A BURN

Due to the toxic nature of the waste to be incinerated, the TNO team leader shall, in consultation with the cognizant EPA, OCS and/or CWM representatives, retain the authority to initiate and/or terminate incineration. The criteria the TNO team leader may use to ensure safe shipboard operation and the minimum 99.9% incineration are summarized below. These criteria, of course, are meant to be used as guidelines. Authority to terminate an incineration shall also reside in the EPA representative or the master of the M/T VULCANUS. If appropriate, fuel oil may be substitued for the waste stream while corrective measures are being taken.

1. Plume impingement

The plume arising from the incinerator stacks will be injected with ammonia as required to make it visible. Incineration of PCB's will be terminated and shipboard personnel will be withdrawn to a safe area if at any time the plume is observed to remain on the deck of the M/T VULCANUS even after corrective measures have been attempted.

2. Spills

Incineration will be terminated and personnel withdrawn to a safe area if a spill occurs that cannot be readily contained or cleaned up.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 12 1982

OFFICE OF
WATER

Mr. Frank Krohn
Vice President and General Counsel
Chemical Waste Management, Inc.
3003 Butterfield Road
Oak Brook, IL 60521

Dear Mr. Krohn:

This letter concerns an extension of the expiration date for your research permit Hq 81-002. The current expiration date is August 28, 1982.

After review of the destruction efficiency data from the December/January burn of PCB wastes in the Gulf of Mexico, the Agency has required that on the next research burn, a sampling train of a different design be placed on the M/T Vulcanus. Since all the sampling accomplished in accordance with this permit is "state of the art" and no standard methods are available, the Environmental Protection Agency (EPA) considers that a sampling train of a different design than the one used previously may give further information on PCB incineration at sea. These further refinements in research application will enable more environmental protection to be guaranteed in this technologically new alternative disposal method for liquid organohalogens. Preparation and installation of the new sampling system will cause several more weeks of delay. EPA will install the new sampling train and will handle the stack monitoring on the next burn. The EPA will be responsible for stack emissions sampling and analysis for the second burn. For a third burn, this responsibility for stack monitoring will reside with Chemical Waste Management and Ocean Combustion Service. All monitoring requirements specified in the permit continue to apply.

Another aspect of delay in the approval for the next burn by the Vulcanus is the air and sea monitoring, planned for the burn. In response to public concerns, the Texas Air Quality Board has set up land-based air monitoring for the next burn. This system was not operational until the end of July. EPA has moved its Ocean Survey Vessel Antelope into the Gulf of Mexico and preparations are underway for both air and marine monitoring on the next PCB burn. Baseline environmental work at the site prior to the burn will test the reproducibility and reliability of this equipment and provide needed environmental information.

In your telex of June 7, you indicated to the Agency that you would have data on destruction efficiency and regulated research concerns by the week of June 21, 1982. As of the beginning of that week, I considered your permit not to be in effect until the data were produced. The additional research requirements and changes in the sampling system on the Vulcanus, and the planned environmental monitoring which the Agency imposed for this burn also delay effective use of this permit. Accordingly, during the period between June 21 and August 6, the earliest date the sampling train may be expected to be in place on the Vulcanus, your permit is not considered to be in effect and permission to burn during that period will not be forthcoming. Correspondingly, the expiration date of your permit is changed to reflect this delay. The new expiration date of the permit is now October 13, 1982.

If you have any further questions on these changes, please feel free to call me any time.

Sincerely yours,

Rebecca W. Hanmer, Acting

Frederic A. Eidsness, Jr.
Assistant Administrator
for Water

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

JAN 26 1982

OFFICE OF
WATER

Mr. Milton Neighbors
Diversified Maritime Services, Inc.
915 15th Street, N.W.
Washington, D.C. 20005

Dear Mr. Neighbors:

This letter is in response to your mailgram of January 6, 1982, concerning your research permit number Hq 81-002. The six-month effective period of your permit started on December 1, 1981, and the expiration date was to be June 1, 1982. With this letter I grant an 85-day suspension of the permit Hq 81-002, as you requested, effective from the date of this letter. The expiration date of the permit correspondingly is extended to August 28, 1982.

Extension of the expiration date is dependent upon a showing to the Agency that the M/T VULCANUS, upon her return from Europe, continues to satisfy all the technical permit requirements and all Coast Guard regulations concerning a ship of her class. In addition, as the permit requires, before the VULCANUS proceeds with any more burns under this permit, the monitoring data for the December burns must demonstrate that the minimum combustion and destruction efficiencies have been met and that there appear to be no adverse environmental impacts at the site.

Sincerely yours,

Bruce R. Barrett

Bruce R. Barrett
Acting Assistant Administrator
for Water (WH-556)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

OCT 2 3 1981

OFFICE OF
WATER

Mr. Frank R. Krohn
Vice President and General Counsel
Chemical Waste Management, Inc.
Oak Brook, Illinois 60521

Dear Mr. Krohn:

We are enclosing Ocean Dumping (Incineration at sea) Research Permit No. HQ-81-002 for incineration at sea of PCB's. This permit has been issued pursuant to authority granted in §1412 of the Marine Protection, Research, and Sanctuaries Act of 1972, as amended, (33 U.S.C. 1401-1444) and delegated to the Assistant Administrator for Water on September 19, 1980.

We urge you to read your permit carefully and to become thoroughly familiar with those provisions for which Chemical Waste Management and Ocean Combustion Service, B.V. Rotterdam are responsible, either solely or jointly with another person or entity.

Thank you for your cooperation in the application and permit issuance procedures. Should you have any questions on any aspects of your permit, please refer them to Mr. Wastler, Chief, of the Marine Protection Branch, at 202-755-0356.

Sincerely yours,

Bruce R. Barrett

Bruce R. Barrett
Acting Assistant Administator
for Water (WH-556)

Enclosure

42-590 O—85——90

DEC 10 1981

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C. 20460

DEC 4 1981

OFFICE OF
WATER

Mr. Frank R. Krohn
Vice President and General Counsel
Chemical Waste Management, Inc.
3003 Butterfield Road
Oak Brook, Illinois 60521

Dear Mr. Krohn:

As Marvin Rubin of my office discussed with you by telephone on November 20, 1981, Special Condition 6g of your permit number HQ-81-002 for the incineration at sea of PCB wastes, issued October 23, 1981, inadvertently omitted the requirement of a 99.9% destruction efficiency.

By this letter, Special Condition 6g is amended. A copy of the revised page 7, where the amendment appears, is enclosed. Please replace your page 7 with the one transmitted herewith.

We also recognize that the threshold limit value for PCB's in the ship's air, (TLV), indicated on page 16, may be unrealistic based upon ambient air measurements of PCB's found in the literature. This problem will be further addressed in discussions between scientists from your monitoring contractor (TNO) and EPA scientists evaluating the monitoring program.

I apologize for the inconvenience of these amendments. Thank you for your cooperation.

Sincerely yours,

Bruce R. Barrett

Bruce R. Barrett
Acting Assistant Administrator
for Water (WH-556)

Enclosure

The permittees shall also navigate around, by a radius of at least 5 nautical miles, the reefs found at the following coordinates:

Claypile Bank

28°20'N	94°09'W
28°10'N	94°18'W

6. Method of Disposal

a. The M/T VULCANUS shall be used for incineration at sea of the material described above.

b. During start-up, the waste shall not be fed into the incinerators until a wall temperature of 1200°C has been reached in the furnace, and only one burner at a time may be changed over to the waste.

c. During tank changeover, prior to each subsequent tank depletion, the ship shall be underway and oriented in such a direction as to minimize plume impingement should incinerator flame be extinguished. At least 15 minutes before tank depletion, pumping shall be switched so that 2 burners of each incinerator shall be fed from a full tank, with the remaining burner unused to deplete the material in the emptied tank.

d. The speed and direction of the M/T VULCANUS during waste incineration shall be controlled in such a manner to prevent incinerator plume contact with the ship.

e. The incinerator wall temperature shall be in operation on both furnances, set to turn off the flow of waste if the wall temperature falls below 1200°C; or if the flame is extinguished.

f. An automatic shut-off device shall be in operation on both furnances, set to turn off the flow of PCB waste if the wall temperature falls below 12°C; or if the flame is extinguished.

g. The combustion efficiency of the incinerator must be at least 99.9 per cent during the incineration. If the combustion efficiency level falls below 99.9 percent, the waste feed on the M/T VULCANUS shall be shut down immediately until corrective measures which assure 99.95±0.05 per cent combustion efficiency are applied.

Destruction efficiency shall be determined to have been 99.9 or greater (see 3.c) before additional PCB waste as set forth in Appendix A is incinerated.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
WATER

Mr. Frank Krohn
Chemical Waste Management, Inc.
3003 Butterfield Road
Oak Brook, Illinois 60521

Dear Mr. Krohn:

This letter sets forth our understanding of the meaning of several permit provisions in accordance with discussions between Chemical Waste Management, Inc., Ocean Combustion Service, Inc., and the U.S. Environmental Protection Agency representatives during the recent inspection of the Vulcanus and the review of the planned implementation of Research Permit HQ-81-002.

1. General Conditions: 14 d. (page 5)

   The sample of "material incinerated" would be emissions from the incineration.

2. Special Conditions: 3. Amount of Material, part c

   Destruction efficiencies for PCB's, PCDF, and total chlorinated organics may be determined on-shore.

3. Special Conditions: 7. Monitoring Requirements, part a

   In the event of instrument failure with no apparent loss of combustion efficiency, the EPA observer may allow incineration to proceed for approximately 24 hours if the remaining monitoring equipment supports a reasonable conclusion that the combustion efficiency requirements are met. The following table suggests the combinations of monitoring instrumentation which we feel are sufficient during this "breakdown" period.

WORKING COMBINATIONS OF MONITORING INSTRUMENTATION

Measured Parameter	1	2	3[a,b]	4[c]	5[b]	6[a]
CO	X	X	X		X	
CO_2	X	X		X		
O_2	X		X	X		X
Wall Temperature	X	X	X	X	X	X

a And $O_2 > 3\%$
b And $CO < 100$ parts per million
c And $O_2 < 3\%$

4. Special Conditions: 9. Research Plan part b

In light of the change in the permit to incorporate destruction efficiency successive burns shall be contingent on successful demonstration of a destruction efficiency of 99.9% for PCB's and chlorinated organics in the previous burn as well as the combustion efficiency requirement.

5. Special Conditions: The Reports and Correspondence

This section should have been numbered item 11, not item 10.

6. Appendix A: Characteristics of the Materials to be Incinerated

This section describes generally the characteristics of the waste material. More detailed information contained in the manifests for each truckload of material is also required.

7. Appendix B: Safety Plan 2. Potential Hazards

The Threshold Limit Value (TLV) of 0.05 micrograms/m^3 in the permit is an error. This section requires that best practice be applied to the operations of the incinerator so as not to allow an increase from background ambient PCB levels. Corrective action must be taken when levels are increasing, but in no case shall levels be permitted to exceed 5 micrograms/m^3.

I wish to thank you for your cooperation during the review and inspection.

Sincerely yours,

Bruce R. Barrett

Bruce R. Barrett
Acting Assistant Administrator
for Water

cc: Donald Obernacker, ERL-Cinn.
David Sanchez, ORD-RTP

Mr. LEVITAS. Were test burns ever initiated for *Vulcanus II* under USEPA permits?

Mr. DIVER. They were test burns.

Mr. LEVITAS. I am talking about *Vulcanus II.*

Mr. DIVER. Oh. *Vulcanus II.* Test burns were performed in the North Sea pursuant to direction of both the Dutch authorities as well as USEPA; that is, USEPA was physically in attendance during one or more of the test burns that occurred with regard to *Vulcanus II.*

Mr. LEVITAS. Who monitors the burns to determine the efficiency and destruction efficiency, burn efficiency?

Mr. DIVER. It is a combination of a Dutch firm—a Dutch firm has been providing most of that service for us in Europe. With regard to the United States it was a Dutch firm, an independent organization who verified the monitoring data.

On the second burn, USEPA itself, with TRW, did the monitoring of the incineration.

Mr. LEVITAS. And do you pay the monitoring contractor, or does EPA pay?

Mr. DIVER. We pay the monitoring contractor. On the second burn here in the United States, USEPA paid TRW, inasmuch as they were requesting that a different sampling protocol be done than that which they had told us would be acceptable and which we had already completed. So they offered to make the payment.

Mr. LEVITAS. Why was the protocol changed?

Mr. DIVER. I don't know. You really would have to ask USEPA why they felt the second protocol was required. In point of fact, the data recovered from that protocol were, in our judgment, less conservative than the data generated from the Dutch firm.

Mr. LEVITAS. I think you have discussed the PCB's that were found at Seymour, and they are now at Emelle and have been mixed with some other materials down there.

Mr. BOCK. Correct.

Mr. DIVER. That they are in tanks with other PCB materials.

Mr. LEVITAS. All right. During these hearings that we have been having—well, I think maybe this is going to take a few minutes. There is a vote in process on the floor right now, the final passage of the Small Business Act, and I think it would be more efficient if we went over and voted and came back, and then I think we could go straight through and wind up in relatively short order.

The subcommittee will stand in recess for 15 minutes.

[Brief recess.]

Mr. LEVITAS. The subcommittee will please come to order.

I want to get your thoughts on this in the record and get into it before I get into my next line of questions.

During our hearings on the Superfund Program, we have had a considerable amount of discussion about the degree of risk waste sites pose to public health and to the environment. And quite beyond the Seymour recycling facility, each case we have dealt with we have heard a lot about it.

Now, earlier today, Mr. Diver, you noted that there was really very little information about the sites available to Chemical Waste Management when you were trying to determine what and how you should go about the cleanup. What I guess I am wondering

about is, now that you have substantially completed your surface cleanup, can you give us a profile of what you found, what types of wastes, what kinds of hazards and health risks do they appear to pose?

Mr. DIVER. Let me indicate at the outset, before Ray Bock testifies, that the assumption had to be made going in, since this was a recycling facility for recycling of ignitable, flammable materials into a solvent-type material, and basically that is what we were refining, halogenated or nonhalogenated organic flammable materials.

Ray, why don't you go on to what you actually found?

Mr. BOCK. At the Seymour facility we found a very broad spectrum of materials, most of which we were not surprised to find, some of which very candidly we were surprised to find.

The materials were both organic and inorganic, a vast majority of the materials included halogenated and nonhalogenated sludges, solvent residues, those types of things.

We also found some cyanide-bearing waste material, reactive material. We found pesticides, C5,6 being the primary candidate. We found PCB's at the facility. And one which surprised us was that we found in addition to explosive materials, we also found radioactive materials, which we had not expected to find.

So it encompassed a pretty broad spectrum of materials at the facility.

Mr. LEVITAS. Would you say that the materials that you found there, the conditions that you found at the site, posed a threat to the public's health?

Mr. BOCK. In my opinion, and particularly in light of not just the variety of materials, but the condition under which the materials were then being stored, primarily in deteriorating or deteriorated drums, I think it definitely presented a threat to the public.

Mr. LEVITAS. And based upon the description of the types of materials that you have just described, were those the types of materials that you would have expected to find at a recycling operation?

Mr. BOCK. Some of the materials might have been byproducts of a recycling operation, but I would say, on balance, the types of materials that we found there were not very amenable to recyclying in the condition that we found them.

Mr. Chairman, while we are at a pause here for a moment, if I may, I would like to amend part of my testimony that I had given previously on a relatively minor issue. I had indicated with respect to the four points, the four outstanding issues, that we are addressing currently with EPA, I had indicated that we had in fact delivered all of the manifests to them. I found out at the break subsequently, there still are a few that are outstanding, we are in the process right now of getting them to them, and they should have them very shortly.

Mr. LEVITAS. That is fine.

Who made the decision to ship material to Evergreen or to any site other than those specified in the work plan approved by the consent order?

Mr. BOCK. I don't know who specifically made that decision. Typically, those decisions are made between the site manager, our site

manager, and generally our operations manager for that given region. Typically, that is where those decisions are made.

Mr. LEVITAS. And do you think that in this—or do you know whether in this case—the site manager made the decision to ship to Evergreen?

Mr. BOCK. I don't know if in fact he did make that decision himself.

Mr. LEVITAS. All right. Now, what was the other person whom you identified?

Mr. BOCK. Regional operations manager for ENRAC. Typically, between the onsite manager and the regional operations manager.

Mr. LEVITAS. Schedell was the site manager. Correct?

Mr. BOCK. Correct. At that point in time.

Mr. LEVITAS. And he was the regional——

Mr. BOCK. The regional manager at that point, albeit I don't believe that was his official title. It was Mike McKinney.

Mr. LEVITAS. So if we spoke with Mr. Schedell and Mike McKinney, we might be able to find out who finally made that decision?

Mr. BOCK. I would think so, yes.

Mr. LEVITAS. When did you find out that there were PCB's at Seymour?

Mr. BOCK. I believe that was fairly early on in our testing, built into the exhibit B to the consent decree, our technical proposal. We had established a specific protocol for testing drums to determine if PCB's were present. And the primary reason for that is that PCB's are one of the few chemicals today that are regulated by a specific regulation, regulated as far as disposal is concerned, by a specific regulation. So therefore, we tried to tailor our operating plan, analytical plan to identify those specifically.

Mr. LEVITAS. And is the fact that one of the reasons that you listed the *Vulcanus* as a site was that you had hoped that if there had been a permit available, that you would have used the *Vulcanus* for purposes of incinerating PCB's?

Mr. BOCK. Precisely, bearing in mind that the first two test burns that the *Vulcanus* performed were test burns of PCB's. And in fact, they were succesful test burns and met the requirements of the permit. So it was in anticipation of having gone through the test burn program under the research burn permit, that at some point within the duration of the Seymour project we would receive a permit to burn the PCB's that we would have gotten from that site.

Mr. DIVER. Just to indicate for the record, the applification for the organo-halogen waste burning permit, the full special permit, was made July 10, 1981, such that by the time of the consent decree, the time it was submitted to the court, the permit application had already been pending some 15 months in EPA.

Mr. LEVITAS. Right. And I think you said it expired a mere 13 days——

Mr. DIVER. That was the research permit. The research permit for the PCB's was proceeding at the same time. An application for a special permit, which is a full permit under the Marine Protection Research and Sanctuaries Act, was proceeding. So there was a research permit that was actually in hand and an application for a full permit that had been pending some 15 months by the time of the consent decree.

Mr. LEVITAS. Fifteen months would have meant that——

Mr. DIVER. July 10, 1981, was the date the full application was made.

Mr. LEVITAS. July 10. Now, according to information we have developed, it is my understanding that a one Jim Sanderson met with Mr. Robert Perry of the Environmental Protection Agency in January 1983 on behalf of Chemical Waste Management, or Waste Management, in order to obtain or encourage approval of the permits for the *Vulcanus.*

Would you describe just precisely what was going on at that time and what Mr. Sanderson's role was?

Mr. DIVER. I will try to make this rather quick. About July or August of 1980 the law firm of which Mr. Sanderson was a member, the law firm being Saunders, Snyder, Ross & Dickson, of Denver, CO, had been retained by the company as water resources and environmental lawyers.

Sometime thereafter, Mr. Sanderson became involved in some of the company's business activities in Colorado. Obviously, you are aware via the FBI report that Mr. Sanderson then became in and out of the employ of the USEPA. And at a point in time in late 1982, December 1982, Mr. Sanderson was asked on behalf of Chemical Waste Management to find out whether something that we had heard that was holding up the issuance of the permits was true. Those were his instructions.

What we had heard was that the Administrator at that point, Ms. Burford, had given directions not to "piecemeal" the ocean dumping program, which instructions were allegedly given to staff, some of whom had involvement in considering the application for the *Vulcanus* permit. You are aware that ocean incineration is covered under the ocean dumping law.

In any event, we were told that because she had given that instruction, that staff had interpreted it to mean that a permit could not be issued for *Vulcanus I* even though all of the research burns had been done, until a permit was issued for *Vulcanus II,* and that we'd have to therefore go about the business of having research burns done on *Vulcanus II* before a permit could be issued.

That didn't make sense to us. We—but it was the reason that was given to us as to why the two permits had to come together and could not be handled——

Mr. LEVITAS. Where did that information come from? Who provided that information?

Mr. DIVER. The information?

Mr. LEVITAS. Yes, sir. About this report that you had heard as to what was holding it up.

Mr. DIVER. It came from one of USEPA's people involved in the issuance of the permit to Mr. Frank Krohn, who was Chemical Waste Management's vice president in charge of the ocean incineration program.

Mr. LEVITAS. Was it someone in the Office of Water?

Mr. DIVER. Yes.

Mr. LEVITAS. And they were processing that permit?

Mr. DIVER. Yes.

Mr. LEVITAS. Do you know who that was?

Mr. DIVER. Yes.

Mr. LEVITAS. May I have the name, please?

Mr. DIVER. Mr. Schatzow.

Mr. LEVITAS. All right, sir. Now, at that point, because of this problem that was being encountered, there was a desire to find out whether it was true or not?

Mr. DIVER. Yes.

Mr. LEVITAS. All right. Now take it up from there.

Mr. DIVER. At that point we were given to understand, obviously not having been present at any meetings or conversations, that Mr. Sanderson spoke with one Mr. Eidsness, who was at that time the Assistant Administrator for Water, I believe, to find out whether or not this was true, and reported back to us that, no, that was not the intention of the Administrator to have done that, what she was talking about was the ocean dumping program and had no intention of holding up permits, then wait for the second permits to come along in the Ocean Incineration Program.

And that was, in essence, what we had been told, just that that indeed was not the policy.

Mr. LEVITAS. So what Mr. Sanderson was able to confirm or to determine was that the information that you had received was not correct with respect to what?

Mr. DIVER. It had been improperly interpreted by the person who had passed it on to us.

Mr. LEVITAS. So, was Mr. Perry involved in that conversation? Or do you know?

Mr. DIVER. To be honest, I haven't the slightest idea.

Mr. LEVITAS. What about Mr. Wood? Have you ever heard the name Chip Wood?

Mr. DIVER. To be honest, no.

Mr. LEVITAS. Was Ms. Lavelle involved in that discussion about the permits?

Mr. DIVER. I never heard her name mentioned in connection with the issuance of this permit or any conversations being had by anyone on our behalf.

Mr. LEVITAS. When you were negotiating with respect to the cleanup protocol and what was to be done and not to be done, did you get involved with Ms. Lavelle or Mr. Hedeman with respect to these discussions, or was it at another level?

Mr. DIVER. I don't believe Ms. Lavelle was ever involved.

Ray?

Mr. BOCK. No, neither Ms. Lavelle nor Mr. Hedeman was involved, to my knowledge, and I believe——

Mr. LEVITAS. Who were the people that you were talking with at EPA?

Mr. BOCK. There were a lot of people that came in and out of various negotiating sessions, but I would say, on a consistent basis, the people that were involved were Frank Biros, Jim Hunt from the State of Indiana, Beverly Kush, I believe Greg Vanderlon from Region V in EPA, and another gentleman whose name escapes me. And he wasn't in a lot of it, but he was in more than one, I believe.

Mr. LEVITAS. Does the name Larry Kyte ring a bell?

Mr. BOCK. Yes. Larry Kyte, he really came in, I believe, as it related to the consent decree and the legal aspects of it, not as much

on the technical package, although I think he did have some input to that.

Mr. LEVITAS. Now, just one more thing. Let me get back to the *Vulcanus.* I want to wind that one up. What wastes were burned during the two test burns on *Vulcanus I,* and what was their source?

Mr. DIVER. The decontaminated waste from various sources around the United States that were brought to Emelle, stored there in tanks, awaiting the ships' arrival in Mobile, at which time once the ship was almost in port or in port, the PCB's that had been intermixed in the tanks from various sources around the United States, utilities and nonutilities, et cetera——

Mr. LEVITAS. What about military sites, any from military sites?

Mr. DIVER. I don't know. There might have been.

Mr. LEVITAS. What about Love Canal?

Mr. DIVER. Some materials from Love Canal, I believe, were put in tanks at Emelle; yes. I don't believe it was from Love Canal, however; I believe it was from an associated landfill up there.

VOICE. It was an associated site, but the name of it was not Love Canal, but it was another.

Mr. BOCK. I think it was some process waste or something along those lines that had been stored for a period of time by Hooker Chemical, I believe, up there, Hooker or Occidental. And we took that material.

Mr. LEVITAS. OK. Now, were there any other requests or applications for permitting ship incineration? Were there any other pending applications to use seagoing vessels for incineration of hazardous wastes at this period of time by your competitors?

Mr. DIVER. By our competitors?

Mr. LEVITAS. Yes. Other than——

Mr. DIVER. None of our competitors had a ship. I am not aware of any applications that were pending.

Mr. LEVITAS. Are you aware of any of your competitors who were seeking loans from the Maritime Administration, loan guarantees in order to acquire a ship for at-sea incineration?

Mr. DIVER. Yes, sir.

Mr. LEVITAS. Which firm is that?

Mr. DIVER. I believe it is At Sea Incineration and Tacoma Boat Building Corp. of the State of Washington.

Mr. LEVITAS. Both of those, or is that just one firm?

Mr. DIVER. I believe it's a joint venture. I don't know how they are structured, their arrangement. But I believe Tacoma is building the ships and At Sea Incineration is going to market their availability.

Mr. LEVITAS. Do you know whatever happened—yes, sir, you wanted to add something?

Mr. BOCK. I believe At Sea Incineration is a subsidiary of Tacoma Boat Building. I believe that is how it is structured.

Mr. LEVITAS. And do you know whatever happened to that application on the loan guarantee?

Mr. DIVER. As I understand, it was granted.

Mr. LEVITAS. And has the ship been acquired?

Mr. DIVER. Not acquired. Built. As I have read in the trade press in the last week or two, the ship has been launched.

Mr. LEVITAS. That is my understanding.

Mr. DIVER. Yes.

Mr. LEVITAS. OK. And that is the only other one that you are aware of?

Mr. DIVER. That is intended to service the U.S. market, that's correct.

Mr. LEVITAS. All right. Does Waste Management, Inc. or Chemical Waste Management have any operations in the State of Louisiana or the State of Mississippi?

Mr. DIVER. Yes. Yes, we do. The State of Mississippi, it is primarily in transportation operations and refuse collection, albeit within the last 3 months an application has been filed with the State of Mississippi to develop a hazardous waste treatment and disposal facility. That was filed by a subsidiary of Waste Management, Inc.

Mr. LEVITAS. Now, the operation in Mississippi, was that started by Waste Management, or was it acquired through a corporate acquisition?

Mr. DIVER. The transportation operations would have been acquired through acquisition.

Mr. LEVITAS. Do you know the name of the company or the predecessor company?

Mr. DIVER. Of the garbage companies?

Mr. LEVITAS. Yes, sir.

Mr. DIVER. No, sir. I could get that for you.

Mr. LEVITAS. I would appreciate it if you could furnish us the name of the company and the name of the principal owners of the company at the time of its transfer.

Mr. DIVER. The name of any transportation we have acquired?

Mr. LEVITAS. No, just in Mississippi.

Mr. DIVER. Oh, just in Mississippi. The name of any transportation company we have acquired in that State, though?

Mr. LEVITAS. Yes, sir.

Mr. DIVER. OK, because there may be multiple transportation companies.

Mr. LEVITAS. I don't think it would be that many.

Mr. DIVER. I don't know.

Mr. LEVITAS. And in Louisiana that you are aware of?

Mr. DIVER. Louisiana, the same thing. Transportation operations, a joint venture with New Orleans and the National Center for Resource Recovery, referred to as Recovery I, which is a refuse shredding operation with ferrous materials recovery.

There are landfills. We operate on contract with municipalities. There are other landfills.

Mr. LEVITAS. What is Waste Mangement of Lake Charles?

Mr. DIVER. Waste Management of Lake Charles is at this point is a refuse hauling company which also operates a sanitary landfill; that is, a municipal waste landfill.

Mr. LEVITAS. If I could have, with respect to Louisiana and Mississippi that information, the names of the companies or the predecessor companies of any transportation operation that was acquired by Waste Management and the name of the principal owners of those firms at the time of acquisition.

[Information received from Mr. Diver follows:]

TRANS ORTATION COMPANIES ACQUIRED IN LOUISIANA AND MISSISSIPPI BY WMI AND SUBSIDIARIES SINCE 1978

Name	Date of acquisition	Principal owners
Allwaste Services of Baton Rouge, LA (Baton Rouge, LA).	1978	Edward Nelson.
Byrd's Refuse Removal Service (Fearl, MS)	Nov. 28, 1978	Ophelia Byrd.
Westside Disposal Company, Inc. (New Orleans, LA).	Oct. 1, 1979	Gerald P. Webre and William Woods.
Calcasieu Sanitation Service, Inc. (Lake Charles, LA).	Nov. 21, 1979	Alvan H. and Reba LaFargue.
Disposal Services of Lafayette, Inc. (Lafayette, LA)	Nov. 29, 1979	Ronald L. Bailey and James M. Olivier.
Waste Contractor's Inc. (Meridian, MS)	July 1, 1982	Andrew F. Pub.
Disposal Management, Inc. (Meridian, MS)		Harry F. Cooper.
Villar Container Services, Inc. (Slidell, LA)	June 1, 1982	C. "Mike" Villar and Lea W. Villar.
Morgan's (Slidell, LA)	July 27, 1982	Wendell Morgan and Nancy Morgan.
S. L. Thigpen & Sons, Inc. (Slidell, LA)	Feb. 24, 1983	Sammuel L. Eugene and Carey Thigpen.
Delaney of Central Louisiana (Pineville, LA)	Jan. 3, 1984	D. H. and Margaret L. Delaney.

Mr. LEVITAS. Now, I have a Waste Management, Inc. annual report for 1982. Is this the most recent one?

Mr. DIVER. Yes; I believe the 1983 is in production now.

Mr. LEVITAS. It will be coming. I notice this last one has a certificate dated March of 1983, so I guess you're about ready to put another one. Would you send us one?

Mr. DIVER. Absolutely.

Mr. LEVITAS. Fine. It is very nicely done.

And there are some interesting discussions in here about the Seymour site, the work that Chemical Waste is going to be doing. It looks like one of the growing areas of the corporate family.

Mr. Buntrock, Dean Buntrock, is the chairman of the board. Is he still chairman of the board?

Mr. DIVER. Yes. Chief executive officer of the parent corporation.

Mr. LEVITAS. And I am not sure I am going to pronounce it correctly—Mr. Eisenger.

Mr. DIVER. Eisenger.

Mr. LEVITAS. Eisenger. He is the vice chairman of the parent company?

Mr. DIVER. That's correct. I believe he may have resigned from that position within the last months.

Mr. LEVITAS. And Mr. Lawrence Beck, what is his position?

Mr. DIVER. He is currently on the board of directors but is not an officer of the parent corporation.

Mr. LEVITAS. He was senior vice president last year?

Mr. DIVER. That's correct. He retired, I believe, in June of this past year, June of 1983.

Mr. LEVITAS. And Mr. Harrison, Milo Harrison, is he still president of Chemical Waste Management?

Mr. DIVER. No; he is not. He is now a senior vice president of Chemical Waste Management. The president is Joseph Knott—K-n-o-t-t—recently hired within the last 2 or so months.

Mr. LEVITAS. Excuse me. Do you know what Mr. Beck's employment was, what he did prior to coming to Waste Management?

Mr. DIVER. Prior to coming with Waste Management?

Mr. LEVITAS. Yes.

Mr. DIVER. He was one of the founders.

Mr. LEVITAS. He was one of the founders of Waste Management.

Mr. DIVER. He operated Refuse Hauling Co. in Joliet, IL.

Mr. LEVITAS. And Mr. Eisenger?

Mr. DIVER. Mr. Wayne Eisenger operated refuse hauling and disposal operations in the State of Florida.

Mr. LEVITAS. And Mr. Buntrock?

Mr. DIVER. He operated them in the State of Illinois, the Chicago area, and Milwaukee.

Mr. LEVITAS. All right. Other than the consent decree, are there any other civil or criminal cases dealing with environmental matters that Waste Management or Chemical Waste Management is involved in as a party defendant?

Mr. DIVER. Or any subsidiaries?

Mr. LEVITAS. Yes, sir.

Mr. DIVER. Yes.

Mr. LEVITAS. Would you give us that information, please? And you can supplement it by giving us the court and style, the case number, but I just want to get some rough idea.

Mr. DIVER. I think I can begin a listing of them, but these would be civil or criminal matters——

Mr. LEVITAS. Yes, sir.

Mr. DIVER. Concerning environmental violations? I am sorry?

Mr. LEVITAS. Alleged violations of environmental laws and regulations.

Mr. DIVER. Administrative or judicial?

Mr. LEVITAS. Yes, sir. Administrative or judicial.

Mr. DIVER. I am sorry, I don't mean—I am not trying to quibble, but——

Mr. LEVITAS. Are you implying that there are a lot of them?

Mr. DIVER. Oh, there are a lot, depending upon how you want to sort them out.

Mr. LEVITAS. That must make your lawyers happy.

Mr. DIVER. No, no.

Mr. LEVITAS. Well, let's see if we can get some sort of logical framework. Federal civil, Federal criminal, Federal administrative.

Mr. DIVER. Federal civil—I am sorry?

Mr. LEVITAS. Federal criminal and Federal administrative.

Mr. DIVER. And Federal administrative. OK. When I indicated a minute ago that there are a lot of matters, there are a lot of matters ranging from the rather trivial to the more serious in terms of the attention they have to be given. And obviously, for a company that operates in practically 40 States——

Mr. LEVITAS. Sure.

Mr. DIVER [continuing]. We would anticipate that that would occur.

Federal civil. I can't think of any—this would be a violation of a Federal law?

Mr. LEVITAS. Yes, sir. Relating in some way to——

Mr. DIVER. Yes.

Mr. LEVITAS [continuing]. Environmental matters. Well, let me just, for a lead-in, what about the——

Mr. DIVER. I can tell you that there are no Federal criminal.

Mr. LEVITAS. There are no Federal criminal cases.

Mr. DIVER. There are no State criminal either.

Mr. LEVITAS. All right. Are you involved on behalf of Chemical Waste Management in any criminal investigations which are pending at the present time, Federal criminal investigations?

Mr. DIVER. The only criminal investigations or matters in which Chemical Waste Management is now involved concern Federal or State indictments or prosecutions of companies who have utilized our facilities or who have claimed that they were utilizing our facilities when in point of fact they weren't. So they are prosecutions with respect to other companies that we are cooperating with Federal and State authorities on.

Mr. LEVITAS. You are, but you are not targets.

Mr. DIVER. I am not aware of any in which we are a target, no.

Mr. LEVITAS. What about those two class actions that were pending in Federal district last year?

Mr. DIVER. Those would be stockholders' actions against the company.

Mr. LEVITAS. Class actions claiming failure to disclose?

Mr. DIVER. Correct. Those have all been subsumed under one piece of litigation, styled *"Grossland* versus *Waste Management, et al."* That matter is still pending. It's, as you indicated, a stockholders' action in which stockholders have made the allegation that the company did not reveal its true liabilities and the company is contesting the matter vigorously.

Mr. LEVITAS. OK. Now, my recollection is there was a case in Atlanta, as a matter of fact, about a year ago involving Georgia Waste Systems.

Mr. DIVER. Georgia Waste Systems, that's correct. That was an antitrust matter. It would not have been handled through my office.

Mr. LEVITAS. Because it was not environmental.

Mr. DIVER. Because it's not an environmental matter. But I am given to understand that the matter is on appeal.

Mr. LEVITAS. Now, there was a case, a civil action, in the Chicago area, by a Mr. Frank, Incorporated against Waste Management. What did they have to do with——

Mr. DIVER. Those were alleged antitrust violations filed by a hazardous waste transportation competitor of our Illinois operation, and again we are contesting it vigorously.

Mr. LEVITAS. Right. And is that an anticompetitive case, or is it one having to do with illegal dumping?

Mr. DIVER. No; it is an anticompetitive case in which counsel for the plaintiff have chosen to utilize the case as a forum for nonlitigation purposes.

Mr. LEVITAS. Any pending Federal civil actions of which the Federal Government is a party?

Mr. DIVER. There are administrative proceedings pending in Region VIII USEPA concerning alleged violations at a facility in Arapahoe County. The two administrative enforcement actions have been appealed to administrative law judges.

Mr. LEVITAS. What is the nature of the allegation?

Mr. DIVER. The allegation in the first one is that, in essence, the company failed to report in its RCRA inspection books the presence of liquid in an interliner zone beneath a surface empoundment—

that's talking about a surface empoundment generally has two liners in between the liner—liquid was found, was not recorded in the RCRA inspection book is alleged to be a violation. There were also allegations of violations in where ground water monitoring wells were established.

The second litigation related to removal of leachate from the burial cells leachate collection system, which had been going into a small tank, I believe, a tank on the order of 1,000 gallons in size or thereabouts, and disconnection of pipe from that tank to allow the liquid to run into a surface empoundment on site.

That disconnection was made when of a day we were being presented with something in the order of 7,500 gallons per day of leachate which we couldn't squeeze into the 1,000-gallon tank. So we disconnected the pipe and allowed the material to run into a lined surface empoundment on the site.

That was alleged, however, to have been a violation because we did not notify USEPA. What the complaint does not recite is that USEPA was standing there while this action was being pursued.

There are also allegations with respect to improper storage of containers at that facility; that is, that some containers appeared to be dented, rusted, whatever. Our principal defense there is that the containers they are talking about, to the extent they ever identified them to us, were not containers of hazardous waste, because that site was receiving approximately 50 percent nonhazardous waste and 50 percent hazardous waste. All of those drums have, since the issuance of that enforcement order, been removed from the site and disposed of by another facility.

Mr. LEVITAS. What is the location again?

Mr. DIVER. It is in Arapahoe County, CO.

Mr. LEVITAS. Go ahead. I didn't mean to interrupt.

Mr. DIVER. I am trying to go back to the main question, which was Federal civil, be they court or administrative actions that may be pending.

I cannot think of any others.

Mr. LEVITAS. All right. If you are able to identify others, would you please submit the information to us for the record?

Mr. DIVER. Certainly.

Mr. LEVITAS. Thank you.

All right, I am getting close to the end on this go-round, and maybe we will be through in a little while.

But you mentioned Mr. Biros earlier, Mr. Bock. And I have here some notes that Mr. Biros made during the period of August through October of 1982 involving the Seymour site negotiations. And there are some things in here that I really have to try to understand as I have looked at these. We had some difficulty getting these notes from EPA, and after resolving a minor constitutional crisis, we finally got our hands on them. And they are interesting.

[Pause.]

Mr. LEVITAS. Were you involved with anybody in these negotiations named David, first name David, at EPA? Could be the last name.

Mr. BOCK. There were so many people, as I indicated earlier, in and out that—but there is a likelihood that I could have met some-

body named David. The name does not pop into my head immediately.

Mr. LEVITAS. There were a couple of things that maybe you would be able to help out on. There is a meeting on September 12.

Mr. DIVER. It's 1983?

Mr. LEVITAS. 1982.

Mr. DIVER. 1982.

Mr. LEVITAS. It says, "No pro rata covenant"—no, I am sorry, it says, "Pro rata covenant issues. No release to CWM for wastes at their facilities where wastes are placed and disposed."

Was there any discussion about that?

Mr. BOCK. Two comments to that. I don't recall ever having had a conversation about that. Second, I don't recall ever having gotten into any conversations with Frank Biros about anything with the exception of the technical proposal. Nothing to do with illegal matters such as that.

Mr. LEVITAS. You don't remember any discussion about a release, seeing a release or wanting a release for waste at your facilities where wastes were placed and disposed?

Mr. BOCK. No; I don't recall anything similar to that.

Mr. LEVITAS. Did you discuss this with IBM?

Mr. BOCK. Not that I recall. I don't recall having any types of conversations along those lines with anyone.

Mr. LEVITAS. Well, somebody did, obviously.

Mr. BOCK. Whoever did, they were working on our behalf. I appreciate that.

Mr. LEVITAS. Somebody says they're not going to give you one anyhow.

Did you ever have any idea of where the $30 million figure came from that EPA was using for purposes of calculating the——

Mr. BOCK. How they arrived at that $30 million figure?

Mr. LEVITAS. Yes, sir.

Mr. BOCK. I haven't the slightest idea.

Mr. LEVITAS. What did you think of that figure?

Mr. BOCK. Based on our initial look at the project and our subsequent look at the project, obviously I think we would have to come to the conclusion that $15 million for surface cleanup was high.

Mr. LEVITAS. There is a question that was raised at the September 16th meeting, where the note says "A.T.," which I suspect is Allen Topol. And it says, "If EPA, CWM working on site and problem occurs, who is liable?"

Do you recall any discussion about liability where you and EPA were working at a site together discussing the question of liability? Did you raise that with——

Mr. BOCK. I think generally in our conversations that that issue was raised. I frankly can't recall any of the specifics of that. However, I think it related to the on-scene coordinator and the authority, whether it was the authority that was granted by the statute or by title, would be called on-scene coordinator, and obviously related to who would be directing the effort and who in effect would be calling the shots on the project. I think it had something to do with that area.

Mr. LEVITAS. Who were the trustees of this settlement, who administered?

Mr. BOCK. The trustees were the IBM Corp., General Motors, Cummins Engine Co., Merchants National Bank in Indianapolis. And they had as a representative for them, they hired a firm named Ludwig Engineering, I believe, who was either onsite all the time or had a representative onsite almost all the time.

[Pause.]

Mr. MOLINARI. I have a couple of questions that I would like to ask of you gentlemen so that I could better understand the question of visible contamination that we discussed before. If you have a copy of the book before you——

Mr. BOCK. Yes.

Mr. MOLINARI. The Seymour site, first picture, which is August 1982, would be the site as you first visited it——

Mr. BOCK. Correct. Prior to us coming on site to perform any work.

Mr. MOLINARI. Now turn to the next page. We have pictures of mobilization, the hiring of local support personnel, training sessions of personnel, air monitoring. Now you have staging of drums and sampling and recording each drum.

I wonder—you have staging of drums.

Mr. BOCK. Correct.

Mr. MOLINARI. It appears that there has been a hole drilled in some of the drums, the interior drums. It looks like a drum within a drum.

Mr. BOCK. Right. What we did there is, we took the drums that were in deteriorated condition and put them into new over-pack drums to prevent any more materials from leaking from the drums.

Mr. MOLINARI. Why were those holes drilled, for sampling purposes?

Mr. BOCK. Yes. Those holes generally are—and, in some cases, I'm sure we had to puncture them—but they generally are the bungs of the drum, the opening into which they would pour product or extract product. And we did our sampling through those openings.

Mr. MOLINARI. Now, turning back a couple of pages—Seymour site, June 1983, showing staging and removal operations in progress.

Mr. BOCK. OK.

Mr. MOLINARI. I don't know if you can see from where you are. Do you see this dark, discolored section over here?

Mr. BOCK. Yes; right here you are referring to?

Mr. MOLINARI. Yes.

Mr. BOCK. OK.

Mr. MOLINARI. Is that what you would describe, if you worked at a site, as "visible contamination"?

Mr. BOCK. That could, in fact, be contamination or it could be coloration because of water, the rain that is on the ground.

Mr. MOLINARI. Well, you cleaned up the site; what did you find when you got there? Was that an area that was, in fact—that had contaminated soil?

Mr. BOCK. That specific area, if it was under the drums, would have been an area that would have been removed.

Now, if you happen to have a copy of exhibit B to the Consent Decree, in that you will see the aerial photograph and the cross dashing indicating the areas that were to be removed. And those were—the areas were determined by essentially two things: No. 1, all areas where tanks and drums were, because it would seem prudent to remove the soil from beneath them, as there undoubtedly is some leakage that had occurred; and second, if you look closely at that photograph, you can see that the lines are somewhat extended in order to accomodate or to take in some of the discolored soil that was readily apparent.

Mr. MOLINARI. Well, my point is, there were areas here where there were relatively few drums but where there was visible contamination, and sand was removed.

Mr. BOCK. Right. Well, there's relatively few drums here at this point.

Mr. MOLINARI. Yes.

Mr. BOCK. Because they've removed many of them, obviously.

Mr. MOLINARI. Was that prior to the——

Mr. BOCK. Oh, sure.

Mr. MOLINARI. OK.

Mr. BOCK. I think, if you'll take a look at the Seymour site August 1982 picture, and the look to this picture here, you will see that there was a great deal of drums in that particular location.

Mr. MOLINARI. OK. Now, going back a few pages—as a matter of fact, I think we'll go all the way back to the last page.

Mr. BOCK. Right.

Mr. MOLINARI. Up on top you have "Clean Soil Replacement and Grading"——

Mr. BOCK. Correct.

Mr. MOLINARI [continuing]. Which is the final stages.

Now you have a picture of the Seymour site, "February 1983." Is that a mistake?

Mr. BOCK. Yes, that is. It should be February 1984. That is a mistake.

Mr. MOLINARI. All right. I assumed it was a mistake, so let the record reflect that that should be "February 1984."

And if you look at that same area that I have described before, we're now, apparently, looking at a completed site, "Surface Work Completed." I am looking at your picture, and I see a large discolored area, as discolored as it was in the earlier pictures which were sometime in between.

Mr. BOCK. Right. I think the discoloration really comes for one basic reason. The soil that we brought in, we had to import, and the coloration of soil was different than that which was originally there.

Additionally, in the center of that photograph, the darker colored soil versus the light-colored soil, or the tan-colored soil, is the one area of the site where we did not or were not required to remove the soil because there had been no drums stored on that location. And that, additionally, is the area to which the site basically drains to, so that that drain water can go to the water-treatment system that is currently on site.

Mr. MOLINARI. So, that may be nothing more than—the area—the reflection of water, this discoloration?

Mr. BOCK. Precisely.

Mr. MOLINARI. Now, would the same thing apply to the spot that I am pointing——

Mr. BOCK. Right here, in the center of the photograph?

Mr. MOLINARI. Right about here. In other words, which is the same location as we pointed out before where there were relatively few drums.

Mr. BOCK. Right. The location that we pointed out before is, in fact, covered now by clean soil.

Mr. MOLINARI. The clean soil happens to be darker in color?

Mr. BOCK. Yes; you can see there are a few patches of standing water, because when this photograph was made, just a couple of days prior it had rained rather heavily.

Mr. MOLINARI. So, what you're telling me is that if we made a picture of this today or sometime after, say, we have 9 or 10 days of sunshine, you will not have a discoloration.

Mr. BOCK. I would not expect that you would have that there, no.

Mr. MOLINARI. And if you did have the discoloration, would that be evidence that you had contaminated soil?

Mr. BOCK. I don't think you can draw that conclusion, because there should be no contaminated soil at the surface where we have replaced the soil. So, that was clean fill that was brought in. That might just be accounted for by somewhat of a minor change in the soil coloration from the borrow pit that we got the fill soil with.

Mr. MOLINARI. Almost half of the surface was not touched in your clean-up operation. And I've looked at the chart that we've talked about before—and it's difficult for me because it didn't copy well—to be able to determine. And then, transposing, I really couldn't tell if it was the same area. When you look at the original picture, that I brought to your attention, it would seem that there was something that certainly warrants investigation there, in terms of at least from a color perspective. Now, that may not mean anything; I'm a layman. But when you look at the final picture and you see discoloration in the same area. Now, we are told that that was probably due to new soil, wet, and because it's wet it photographs as it is here.

Mr. BOCK. Sure.

Mr. MOLINARI. I would be interested in seeing some pictures of that dry and seeing whether, in fact, that color disappears.

Just one last question and I think I am finished.

You furnished the subcommittee with a supplement testimony today.

Mr. DIVER. Yes.

Mr. MOLINARI. I don't know, Mr. Chairman, whether that has been read into the record.

Mr. LEVITAS. No; it hasn't. In fact, I'm not sure I've got it.

Mr. MOLINARI. It is entitled, "Supplement to Statement of Jeffrey Diver."

Mr. DIVER. It is contained in these three files that I indicated.

Mr. LEVITAS. Well, without objection, the entire document known as "Supplement to Statement of Jeffrey Diver" will be made a part of the record.

[Information received from Mr. Diver follows:]

Supplement

to

Statement of Jeffrey Diver, Vice-President and General Counsel,

Chemical Waste Management, Inc.

before the

Oversight and Investigations Subcommittee

of the

Committee on Public Works and Transportation,

of the

U.S. House of Representatives

Hearings of March 15, 1984

This Supplement to the Chemical Waste Management, Inc. testimony delivered by Mr. Jeffrey Diver includes the following items:

* Consent Decree in Seymour matter.
* Chemical Waste Management, Inc's Technical Proposal for Removal and Disposal of Drummed Hazardous Chemicals at Seymour, Indiana (Work Plan).
* Chemical Waste Management, Inc.'s Monthly Reports on Seymour cleanup from December, 1982 thru January 1984.
* Letter to Robert Schaefer, US/EPA from Raymond Bock, Chemical Waste Management, Inc. dated March 21, 1983, on subject of Drum Crushing Pad.
* Supplemental statement of Chemical Waste Management, Inc. on the application of CERCLA to the Seymour cleanup.

Supplemental Statement

of

Chemical Waste Management, Inc.

for

Oversight and Investigations Subcommittee

of the

Committee on Public Works and Transportation,

U.S. House of Representatives

at

Hearings of March 15, 1984

The Application of CERCLA to the Seymour Cleanup

We believe it would be useful to this Oversight Subcommittee to know how Chemical Waste Management, Inc. (CWM) implemented CERCLA (Superfund) as a contractor at Seymour. A number of problems arose in connection with this sizeable cleanup operation and we are glad to share our experience with the Subcommittee. It is our hope that through a clinical look at our Seymour operating experience, the subcommittee will have a clearer picture of the strengths and weaknesses of this most important environmental statute.

Cleanup of the Seymour Recycling Corporation site at Seymour, Indiana was a voluntary enterprise of 24 generator firms. It was agreed that cleanup would extend to the surface area only, and not the subsurface. CWM undertook to perform the tasks set forth in its

technical proposal for the sum of $7.7 Million and obtained a performance bond for twice that amount. The agreement was incorporated into a Consent Decree with approvals secured from the U.S. District Court, the U.S. Department of Justice, the U.S. EPA, and the State of Indiana. In consideration of their agreement to cleanup the surface the 24 generators secured a release from further liability for subsurface contamination, if any. Indiana's refusal to contribute its state share under CERCLA prevented EPA from reaching the federally established Superfund and, thus, triggered the voluntarism movement among the generators.

After its selection as contractor, CWM's Environmental Remedial Action Division (ENRAC) began mobilization in December, 1982. ENRAC, with its 35-man crew, encountered a site that contained over 45,000 55-gallon drums that in some areas were stacked four or five drums high. Also present on the site were over 100 bulk storage tanks containing liquid waste, much of it later found to be highly flammable.

The work, to be accomplished in phases, included:

- establishment of an ongoing air monitoring program;
- sealing off on-site wells and underground piping running through the site;
- chemical analyses and preparation of wastes for transportation, treatment, and disposal;
- bulking of compatible materials, erection of a drum crushing pad and crushing of empty drums prior to transport off site;
- transportation, treatment and disposal of all wastes, on-site tanks, debris and soil to fully approved company

treatment/disposal facilities;

- and finally, restoration of the excavated area with clean soil and grading of the site.

Oversight of the foregoing activity was provided by EPA's On-Scene Coordinator (OSC), the agency's authorized agent, who was present onsite for approximately three-quarters of the project activity.

To best understand what a contractor faces in a cleanup that is measured against the provisions of CERCLA, we need only consult the EPA internal memo of December 8, 1983 from the Director of the Superfund Task Force to Alvin L. Alen and Lee M. Thomas, at p.1:

> [I]t (CERCLA) is not a regulatory statute; it is a response and financing scheme. There are few detailed statutory standards, and there is little need for the extensive regulations routinely promulgated under other statutes.

Reasonable environmental management standards applied consistently, and a clarification of applicable regulations for site cleanups would be welcome by both contractor and, we suspect, generator alike. The issue of future liability is one the contractor faces daily. The contractor needs the protection of predictability -- a set of standards that will protect the environment and be achievable at the same time, a set of standards not so stringent as to be counter-productive.

While a great many problems were anticipated in CWM's Work Plan

for Seymour, a number were not. They constituted a gray area for CWM. Some examples may be instructive.

The issue of on-site spills from leaking drums, or "leakers", is of concern at a site like Seymour where 45,000 decaying drums posed a constant spillage threat. CERCLA regulations require notification to EPA of small quantity spills. Should this requirement reasonably apply to a listed Superfund site containing hundreds, if not thousands, of drums that handling will cause to leak if they are not already in that condition?

At Seymour, we handled small quantity spills (less than one drum) with an absorbent called "oil dry" and logged in the amounts of oil dry used at the site and where. These applications were then routinely picked up and removed. This arrangement was approved by EPA's On-Scene Coordinator. However, there is no written EPA guidance or policy on procedures for addressing such small spills during a cleanup. They must be resolved on a site-by-site basis, and OSC's are free to differ with one another on this particular aspect of regulatory compliance. The nagging question to the contractor is whether the oil dry procedure approved at Seymour is sufficient to protect the company from future liability -- taking one directly back to the controversy on 'how clean is clean'.

Whether the regulations required a RCRA emergency treatment permit for certain flammable liquids and sludges was another issue. ENRAC discovered larger than anticipated quantities of flammable liquids and sludges in the 45,000 drums on site. After vacumm pumping of the drums' liquid contents, flammable sludges remained that required solidification for safe transport to a treatment/disposal

facility. Our technical proposal contained no provision for solidifying flammable sludges. We ask the OSC for approval to solidify the sludges inside cut-open bulk tank halves. After consultation with the regional EPA office, the OSC advised that the solidification procedure would require a RCRA emergency treatment permit. The solidification procedures were delayed several weeks pending issuance of that permit.

The problem here was how should the regulation be interpreted. It provides for a permit exemption if the waste and solidification agent are combined for the first time in a "container." EPA decided that a cut-open tank was not a container and, therefore, required the emergency permit. We subsequently learned from an EPA Regional official that a roll-off box (which was available) would have satisfied the RCRA definition of "container". By that time, however, we had secured the emergency permit for solidification in the tanks so we elected to continue with that approach rather than change to roll-offs. In actuality, we conducted a sizeable number of RCRA activities on site, but because they had been anticipated and included in our technical proposal, no emergency permits were needed.

While we do not wish to place undue emphasis on this single example, we would suggest that, in a large job particularly, where discretion must be exercised by the OSC on a number of occasions, a more expansive problem-solving orientation with respect to regulation interpretation rather than a narrower, more bureaucratic focus will ultimately result in more expeditious, cost-effective cleanups. Or, perhaps, this may be a place where clarification of the applicable regulations is appropriate.

The lack of environmental management standards and the resulting potential environmental and regulatory liability carry over into the area of drum crushing and the construction of staging/treatment areas. Although the legal community in the past has debated the applicability of RCRA provisions to a remedial cleanup, our company in practice took the conservative view at Seymour.

For example, for an "empty drum" to be considered a non-hazardous waste under RCRA the drum must contain less than one inch of residue. However, for P-coded (acute) wastes the one inch or less requirement does not apply, and those drums must be triple washed to ensure cleanup. The problem here is that EPA has not developed a standard procedure to measure for one inch residues. To avoid exposure to future liability on this point, ENRAC considered all drums and their contents at Seymour to be hazardous waste.

In addition, no specifications currently exist for construction of what EPA considers an environmentally sound drum crushing pad. In constructing our drum crushing pad at Seymour we, again, reduced our exposure to future liability by adopting an extremely cautious approach. (For exact specifications, see letter of CWM's Ray Bock to EPA's Robert Schaefer, dated March 21, 1983, included in our Supplement.)

Our conservative approach to construction of the pad serves to illustrate the dilemma created for responsible contractors who must compete in a cleanup program where the application of environmental management standards is often a "moving target." In many cases no standards exist, and where they do exist they are not always consistently applied. To make the point without intending to be

self-serving, another firm, with less rigid internal environmental compliance standards, might have opted to construct a less environmentally sound pad at considerably less expense and still have it acceptable to EPA's authorized on-site agent, the OSC.

After a number of operational problems arose at Seymour requiring the exercise of judgment or discretion by either the company or the OSC, we decided a adopt a company policy, to apply to the remainder of the Seymour cleanup and to all future ENRAC cleanups, that would require extensive written documentation on significant operation decisions and a sign-off by the OSC. We felt the step was necessary because, as hereinabove discussed, CERCLA (and often other environmental regulations) fail to address certain problem situations that are either outside of or vary from the letter of the regulations. In the past, agency officials have operated through an informal variance arrangement by which the OSC or other official verbally authorizes an action that is environmentally benign but at the same time not fully addressed in the contract or technical proposal. That practice opens both the regulators and the contractor to charges of impropriety. Written documentation will obviously confirm on-site discretionary decisions -- and, from our standpoint, there is too much potential exposure to liability to be sanguine about the regulatory environment that we operate in today.

Perhaps the foregoing examples provide some insight into the daily operational problems of contractors whose job it is to descend from the lofty heights of policy and slog around in the muddy depths of actual contamination -- and end it. Our daily needs have to do with the consistent application of environmental standards and the

clarification of regulations.

Our experience in the field leads us to endorse some of the findings and recommendations of EPA's Office of Management Systems and Evaluation (in the Office of Policy and Resource Management) in its May, 1983 Management Review of OSWER Programs. In particular, we would cite the following:

* It is within the agency's power to emphasize either an agressive site response program or closely guarded management of the Superfund resources provided by Congress.

* There are conflicting actions to achieve state cooperation in Superfund cleanup program activities.

* There is a general reluctance to take risks...We found situations where as many as 16 concurrences by Headquarters staff have been required for some routine Regional reports.

* Agency managers erected...barriers for the purpose of management control, but their effect has been to foster a bias toward slow response at priority sites...

* Regional resources are not used to best advantage. The Headquarters view has been that Regional managers are "too close to the ground" to accurately appraise the relative severity of problems at one site in light of other problems nationwide... Because Headquarters has been unable, in a number of

instances, to issue clear guidance to units in the field, the Regions have found the approval process (on which they must rely to get action) subject to changed signals, multiple drafts of documents, and conflicting directions.

We applaud EPA's self-audit and also agree with another of the Report's conclusions: "Much of this must be regarded as part of the normal learning process as Agency managers at all levels feel their way through the start-up phases of a complex new program."

It is the hope of Chemical Waste Management, Inc. that as both the regulators and the regulated community gain new experience with and insight into CERCLA and its larger purposes, the program's center of gravity will shift to achieve a new balance that is acceptable to all.

ERRATUM

In document entitled
"Supplement to Statement of Jeffrey Diver, Vice President and General Counsel, Chemical Waste Management, Inc., before the Oversight and Investigations Subcommittee of the Committee on Public Works and Transportation of the U.S. House of Representatives Hearings of March 15, 1984"

At page 2, lines 16 and 17:
The finding of "highly flammable" material should be applied to the 45,000 drums and not to the 100 bulk storage tanks.

Mr. MOLINARI. I just have one question on that, which I think is a good question that is posed by you, Mr. Diver, and that is at the end of page 3 of that supplemental statement. You say:

> The issue of future liability is one the contractor faces daily—a contract that needs the protection of predictability, a set of standards that will protect the environment and the achievable, and, at the same time, a set of standards not so stringent as to be counterproductive.

Just this week in 3 days of hearings we've learned that things are not so predictable, even to the extent of what a bid would be. You can give a ball park figure, you can give a lower figure, and you've got your figures crossed because you, yourself, testified that you found a lot of substances there that you weren't aware of until you got into the work itself.

How do we cure that problem of predictability; or, conversely, how do we limit the liability of the contractor without losing protection for the public?

Mr. DIVER. I'm not sure how you afford the absence of protection for the contractor. But in terms of the issue of predictability, one of our principal concerns is that there is no baseline standard for how sites are going to be cleaned up. I'm not even talking, at this point, about the baseline standard for how clean should they be when we leave them; but should they be fenced, should they have surface water management systems, what should they be like, are they required to obtain permits, are they subject to the Resource Conservation Recovery Act, are they subject to TOSCA, are they subject to CERCLA's film response provisions, film notification provision?

There is no standard that has been set. So, when a contractor, such as we, wants to bid on a project, we're necessarily guessing at what it is that EPA will ultimately tell us we have to do. We did not bid, for example, on Seymour, on the assumption that we were going to have to obtain emergency permits to treat certain wastes on site at Seymour, such that they could be transferred off site.

Mr. MOLINARI. But I would assume, because of that lack of predictability, you are factoring in some contingent percentage——

Mr. DIVER. To the extent you can. To the extent that you can. But it is still a competitive business and you have to be as competitive as you can. And a certain amount of aggressiveness has to be built in or you just say, "I won't be in the business." It's misty in the sense that you aren't going to know before you come on site, generally, exactly what you are going to find. They can be a mixed bag and there will be circumstances, undoubtedly, where any contractor engaged in cleanup is going to lose money because he guessed wrong as to what was going to happen happened.

The extent to which guesswork can be eliminated—and it probably can't with respect to the waste, itself; but understanding exactly the rules that everybody is going to play by, whether they are playing in region 10, or region 1, or region 3, or region 7, would be helpful.

Mr. MOLINARI. How big is your company?

Mr. DIVER. How big is it?

Mr. MOLINARI. Personnel?

Mr. DIVER. Revenue this year?

Mr. MOLINARI. No, personnelwise.

Mr. DIVER. Personnelwise? That is a good question.

Mr. MOLINARI. I guess it's pretty big.

Mr. BOCK. I think here in the United States, in North America, we have on the order of 12,000 employees; worldwide, I think——

Mr. MOLINARI. Are we talking about Waste Management or Chemical Waste——

Mr. BOCK. Well, Waste Management, Chemical Waste Management; you know, the Waste Management companies. There's somewhere in the area of 12,000 people, I believe. And I think, worldwide, we are somewhere between 20,000 to 24,000 people.

Mr. MOLINARI. And how many of that 12,000 would fall into the Chemical Waste Management operation?

Mr. BOCK. Oh, gee, I'm not really sure of that number.

Mr. DIVER. I wish I had known you were going to ask the question, because I received documents yesterday that indicated the answer. I'll supply that for the committee.

[Information received from Mr. Diver follows:]

3-14-84
Pam-
Make copies for
all attys & Board
Jeff

MAR 14 1984
Bill

March 7, 1984

RECEIVED 3/15/84

TO: Officers
Region Managers
Market Development
Corporate & Public Affairs

FROM: Ron T. Shufflebotham

RE: Waste Management, Inc. and Subs - Statistical Data

The following data is provided by John LaCognata semi-annually to provide management with an update on approximate employee, customer and property totals. These amounts exclude nuclear and industrial minerals operations. You may wish to distribute this report to appropriate marketing and management personnel within your jurisdiction.

NORTH AMERICAN ENTITIES

	12/31/82	6/30/83	12/31/83
EMPLOYEES			
Management and Office	2,006	2,127	2,270
Drivers & Helpers	3,259	3,453	3,782
Mechanics & Maintenance	1,268	1,317	1,442
Equipment Operators	532	557	596
Other	831	937	1,037
TOTAL	7,896	8,391	9,127
EMPLOYEES INVOLVED IN			
Chemical Waste	1,134	1,231	1,491
Collection	4,121	4,384	4,753
Processing	200	207	200
Disposal	490	546	581
Other	1,951	2,023	2,102
TOTAL	7,896	8,391	9,127
NUMBER OF CUSTOMERS			
Residential	2,479,839	2,797,375	3,146,662
Commercial Sites	175,668	179,930	204,075
Other	35,019	36,661	39,180
TOTAL	2,690,526	3,013,966	3,389,917

	12/31/82	6/30/83	12/31/83
TOTAL MUNICIPAL COLLECTION CONTRACTS	219	256	314
COLLECTION VEHICLES IN SERVICE			
Rear Loaders	942	1,000	1,070
Front Loaders	859	895	922
Roll-offs	815	803	832
Side Loaders	404	423	443
Other	83	108	112
TOTAL	3,103	3,229	3,379
TOTAL CONTAINERS	290,783	303,635	323,546
STATIONARY COMPACTORS	3,544	3,759	3,995
INTERIM PROCESSING TRANSFER VEHICLES			
Spotter Tractors	15	17	17
Over the Road Trailers	194	223	263
Over the Road Tractors	85	99	114
Other	21	35	41
TOTAL	315	374	435
OTHER VEHICLES IN SERVICE			
Pickups & Delivery Trucks	823	855	901
Autos	118	126	115
Other	160	185	194
TOTAL	1,101	1,166	1,210
CHEMICAL WASTE HAULING EQUIPMENT			
Chemical Waste Trailers	389	413	449
Chemical Waste Tractors	243	255	263
Other	98	103	120
TOTAL	730	771	832

	12/31/82	6/30/83	12/31/83
LANDFILLS OPERATED			
Owned	43	46	46
Leased	29	31	32
TOTAL	72	77	78
ACREAGE OF OPERATING LANDFILLS			
Owned	8,627	9,144	9,857
Leased	3,947	4,142	4,080
TOTAL	12,574	13,286	13,937
LANDFILL, INTERIM PROCESSING AND OFF-HIGHWAY CHEMICAL WASTE MANAGEMENT EQUIPMENT			
Compactors (landfill)	96	101	109
Draglines	10	10	11
Dozers	118	134	143
Scrapers	117	124	128
Trucks	189	209	241
Loaders	38	43	45
Other	169	169	190
Chemical Waste Landfill Equipment	236	221	238
TOTAL	973	1,011	1,105

NON-NORTH AMERICAN ENTITIES

	12/31/82	6/30/83	12/31/83
EMPLOYEES			
Management and Office	955	798	790
Drivers & Helpers	4,240	4,282	4,336
Mechanics & Maintenance	1,079	1,038	1,072
Equipment Operators	55	59	52
Other (primarily streetsweepers)	1,189	1,214	1,155
TOTAL	7,518	7,391	7,405

	12/31/82	6/30/83	12/31/83
NUMBER OF CUSTOMERS			
Residential	1,004,500	1,016,130	1,016,310
Apartment Units	106,500	106,500	106,500
Commercial Sites	33,438	33,551	34,053
Institutional Sites	656	713	716
Industrial Sites	1,261	1,266	1,300
Other	580	580	580
TOTAL	1,146,935	1,158,740	1,159,459
VEHICLES IN SERVICE			
Refuse Collection:			
Rear Loaders	374	368	367
Side Loaders	211	212	212
Roll-offs	75	78	81
Load Luggers	21	21	21
SUBTOTAL	681	679	681
Streetsweepers	161	170	175
Other (cars, pickups, etc)	855	909	876
TOTAL	1,697	1,758	1,732
TOTAL CONTAINERS			
(excluding dustbins)	10,632	10,763	11,995
LANDFILL EQUIPMENT			
Compactors	7	7	7
Dozers	9	9	9
Scrapers	4	4	4
Other	3	3	4
TOTAL	23	23	24
ACREAGE OF OPERATING LANDFILL	987	987	987

Mr. MOLINARI. Is it 25 percent, or smaller or larger?

Mr. DIVER. It may be as high as 25 percent.

Mr. MOLINARI. The reason for my asking that question is because when we speak to a witness representing corporations such as yours and we discuss these very difficult issues, sometimes I think that government has to look to the cooperating business industry for help in coming up with some of the answers. It may be that the expertise of those that are employed by you can furnish some of the answers or all of them.

Mr. DIVER. I'm glad you asked that or made that comment, Congressman. You are probably aware that USEPA is involved, now, in trying to establish a policy as to how the Superfund law integrates with the Resources Conservation Recovery Act, the Federal Water Pollution Control Act, the Toxic Substance Control Act. It was somewhat perplexing to us that, in the development of that policy, as to how the interrelationship is going to occur, or should occur.

The USEPA sought out the comments of the States, comments of the environmental community, it sought out comments of Congress and State legislators, but did not seek out comments of the community who will actually be engaged in cleaning up sites.

Mr. MOLINARI. The chemical manufacturers, I think———

Mr. DIVER. No; I don't think they were particularly solicited. They may have heard about it, but their comments were not specifically solicited.

All I am indicating here is that we think, as part of the cleanup industry which exists in the United States, that we have something to offer USEPA, telling them how that program might better be run. Places where even statutory amendments aren't required where really, as a matter of policy or regulation, that they can be altered in some fashion to control them a little better.

Mr. MOLINARI. I can't say that I disagree with that conclusion. I would assume that an outfit as big as yours would be one that has a great deal of experience, maybe not all good—which leads me to my last question.

In your opening statement you mentioned that you've made mistakes. What were you referring to there, the mistakes that you had made? You're talking about Seymour there, aren't you?

Mr. DIVER. Yes; we obviously made mistakes at Seymour. Some of those were reflected in the comments per se.

Mr. MOLINARI. I'd be interested in those that aren't reflected in the comments.

Mr. DIVER. I think some of the mistakes really related to the necessity to have an intensification of personnel, especially at commencement of a project, to really get the act together.

Mr. MOLINARI. OK, now, if you were to go through this whole exercise again———

Mr. DIVER. Well, we are. We do; in other places, albeit.

Mr. MOLINARI. Well, I understand. OK.

Knowing what you've learned from Seymour, which has achieved a great deal of notoriety throughout the country, what would you do differently?

Mr. BOCK. I think the one thing—well, I think the key thing that we've learned from the Seymour experience, we certainly knew

how to test chemicals, we knew how to handle chemicals, that type of thing. The one thing that I think is most valuable to us is the level—and Jeff alluded to it—the level of administrative personnel that you need there, particularly if you are operating under a consent degree. But regardless, if you are or are not, I think the level of administrative personnel, those people that monitor your activities, those people that be sure that you document everything, that, I think, really brought to focus to us an issue that we had not paid as much attention to as we possibly should have—which, you know, at the beginning of our testimony today—I think, resulted in some of the problems that we have discussed today. That, I think, is a key area for us, the number of administrative people to be able to interface, deal with EPA, deal with the State people, and to be able to communicate and document when changes are to be made and why they have to be made and so forth. That is, I think, the valuable lesson learned from Seymour.

Mr. MOLINARI. Thank you. And I guess we close with this observation, that testimony we had earlier from EPA, I was far from satisfied with the onsite monitoring activities that are employed by them at this site. I think if they had done a better job we wouldn't have been talking about some of the problems we have been discussing the last several days.

Mr. Chairman.

Mr. LEVITAS. By way of followup on some of the points that Mr. Molinari just covered, this morning you said you were going to supplement your statement with some materials that you would be sending to us—the monthly reports, the document on the drum compression pad incident, and so forth. And all of these will be made a part of the record.

One of the supplement items I recall you made reference to was a review of the problems or incidents that you experienced at Seymour when you were carrying out your first large voluntary cleanup under this new program. And is that this document?

Mr. DIVER. Yes; it is.

Mr. LEVITAS. OK. This has already been made, as I've indicated, a part of our record.

In addition, it occurs to me that Chemical Waste Management is in the position of being a potentially responsible party in some instances, be it because you acquire a company with liability, as in the case of Waste Resources of Tennessee, or, let's assume one of your interim permitted sites under RCRA springs a leak. In other words, as a corporation you can face many of the same types of concerns of potential liabilities that IBM, or Alcoa, or General Motors, Monsanto face, or maybe even more; is that so?

Mr. DIVER. Without acceeding to the "or maybe more," I would say probably less.

Mr. LEVITAS. I thought you would embrace it.

Mr. DIVER. Without embracing that statement it is fair to say that a company such as ours is facing the potentiality of liability as a transporter, as a restorer, as a treater, as a disposer of all varieties of waste. And that is a liability we face, we acknowledge. And that is one of the things I say we have to face up to. We would not be in our business very long if we walked away from the site that may be causing the problem.

Mr. LEVITAS. Well, I would, then, think that because of your dual role in these types of situations, I want to offer you the opportunity to add things, to add to what you have already submitted, will submit, any recommendations that you might have with respect to either administrative or statutory changes in Superfund or RCRA. That we will make part of the record, and your considerations.

Mr. DIVER. We will definitely do that, Mr. Chairman.

Mr. LEVITAS. I have now identified the points I wanted to in reading Mr. Biros' notes, to see if you can shed a little light.

At a meeting on October 1—sort of focus on that—1982, Union Carbide and some of the others are getting their noses out of joint and they feel that they're being jerked around by the TOPOL group who settled for 50 cents on the dollar. And then they say—they're talking about the proposal that they're going to be making; they talk about the administrative order, the stipulation of performance, put up a total of $15 million, does not give them a judicial forum. Two performance bonds, they say, are not enough, they want $15 million; that would eliminate the 50-cents-on-the-dollar argument and the sweetheart deal. And then they've got this statement which I do not understand: "Don't want to endorse CWM."

Mr. BOCK. I have no idea what these references are.

Mr. LEVITAS. The only thing I could make of it is that some other proposal there would have been, apparently, an endorsement of Chemical Waste Management and they are saying "we don't want to do that"—as I will tie in to something that appears in a later note of his.

Then he has the notation: "Gene"—which I presume is Gene Lucero—"go to them with CD"—consent decree—"back off is administrative order with $15 million and performance bond and contingent on liability. Concern for approval of CWM"—also concern for approval of CWM.

Were you engaged in any conversations with Gene Lucero in which you or he expressed some concern about approval of Chemical Waste Management?

Mr. BOCK. I don't think I ever, throughout the entire Seymour negotiations, I ever talked to Gene Lucero.

Mr. LEVITAS. You never did?

Mr. BOCK. I don't believe I did. I can't recall ever having done that.

Mr. LEVITAS. I see someplace in this meeting, AT, whoever that may be, says, "Deal ridiculous."

On October 7 there is a discussion, and one of the points that comes out there is they want to put a paragraph in the document.

They say—by the way, they say, "If Du Pont and WE"—Western Electric, I guess—"walk, Monsanto will come in."

But they say they that they want a separate paragraph to define CWM responsibilities.

Mr. BOCK. In the consent decree.

Mr. LEVITAS. Yes.

Mr. BOCK. I believe that is how it was structured.

Mr. LEVITAS. So, they're talking about if they go to a consent decree, they want it to define those responsibilities in the order itself; and that, as you said you were going to sign on, is part of that consent decree.

And I think I've got one more—two more.

October 12, 1982—again, Mr. Biros' notes: "Seymour"—they define they're moving closely toward a settlement agreement. They list the legal risks and make a list of them, talk about State law and contribution, things like that. Then they say, "Risks," dash, "political."

Now, this is October 12, 1982. The first one says, "Jim Sanderson." The second one says, "CWM favored treatment, Jack Anderson's column." And then the last one has to do with the concern of the small generators who felt excluded and the sweetheart deal, 50 cents on the dollar.

But the first two—was there discussion within your group as you were dealing with this, in which risks, political risks or concerns, were expressed about either Jim Sanderson or CWM's favored treatment and something in the Jack Anderson column?

Mr. BOCK. If I may, for the record, say the following.

Mr. LEVITAS. Yes, sir.

Mr. BOCK. As it relates to our company and the Seymour negotiations, I was the primary focal point; which I'll define as follows: Any communications, any information that had passed hands, either came to me, through me, or was initiated by me, to the generator group, to EPA, and so forth. And I can tell you this: I have never met Jim Sanderson, I have never talked to Jim Sanderson, I would not know Jim if he were sitting in this room. At no time did I ask anybody in the company to contact Mr. Sanderson to try to have him help us in any way with the Seymour package. I think that has been an invention, that particular contact.

Mr. DIVER. Let me add one more thing.

There was, as I recall, at or about that point in time starting October 1982, a news story by Jack Anderson in which he focused on Jim Sanderson, on Jim Sanderson's connection with the USEPA, or his employment at one point with it, and indicating, reciting, a list of Sanderson's clients or some of his clients, including Coor's, the Denver Water Resources Board, and Chemical Waste Management; as Chemical Waste Management had been—and was, at that point—a client of Saunders, Snyder, Ross & Dickson, Mr. Sanderson's law firm. It was a generally negative story, and I would interpret the notations that were made to relate to that story.

Mr. MOLINARI. Would you suffer an interruption?

Mr. LEVITAS. Be happy to.

Mr. MOLINARI. How did you come to employ that law firm?

Mr. DIVER. I indicated in my very early statements that the Saunders firm was retained first by us around July-August of 1980. And they had been recommended to us by the city and county of Denver as a firm expert in water resources and environmental law in the Denver area. And you may know that we were, at that point in time, beginning the establishment of a hazardous waste facility operated for the city and county of Denver, which was also the facility that we were talking about earlier that was the subject of the enforcement action of the EPA.

Mr. LEVITAS. What was the name of that facility, "Lowry"?

Mr. DIVER. No, the name of the facility is the Denver Arapahoe Chemical Waste Processing Facility, and it is located on a parcel of property which used to be the U.S. Army Air Force's bombing

range during World War II, known as the Lowry Bombing Range. It is a parcel that is immense in size, that has operations by the Denver Metropolitan Sewage Authority in sludge spreading, has pits, ponds and lagoons from Shell Chemical Co. at another part of it, has a tire salvage operation by the city and county of Denver on another part of, has sanitary landfill operation on another part of it, and at a part of it has the hazardous waste operation run by Chemical Waste Management. The whole mish-mash is being labeled "The Lowry Landfill," because it's all at the old Lowry Bombing Range, albeit we're talking about miles between facilities.

Mr. LEVITAS. You have a hazardous waste facility there, but this particular contact was not related to that when you employed the Sanderson firm of July of 1980, but with respect to building or constructing for the city of Denver a sanitary landfill.

Mr. DIVER. No. This was to build for the city and county of Denver a hazardous waste site.

Mr. LEVITAS. Hazardous waste site.

Mr. DIVER. They had a problem; things were not operating in the cleanest fashion. And they asked for bids. Bids were made, the award was made. We got the award to build the contract—to build the facility, and the Saunders firm was contacted in July or August with regard to a water resources issue that didn't even come through my office, it came from some people in the field.

Subsequently, in about October-November of 1980, Jim Sanderson's name first came up, because at that point in time some neighbors—it was already late 1980—some neighbors had sued the city and county of Denver for nuisance arising out of this mish-mash of operations on this property. And the city and county of Denver as well as Chemical Waste Management, Inc., because it was in the process of developing or just beginning the operation of this hazardous waste facility, were named as defendants in that lawsuit. Sanderson first came to our attention at that point, obviously. Other people in the firm had been representing us. He joined at that stage, continued to represent the facility in environmental matters. When I say "he," there were two fellows, Jim Sanderson and Gene Megyesy of that firm, who were the principal environmental attorneys representing our interests. Gene Megyesy became, very soon, about the only attorney representing us on environmental matters within that firm. That's how we came into contact with that firm and when.

Mr. MOLINARI. You did go to Sanderson when you wanted to check up on information that you had received?

Mr. DIVER. Oh, yes.

Mr. MOLINARI. From within EPA?

Mr. DIVER. That's right. That's right.

Mr. MOLINARI. So I would have to assume, from that, that you considered that he had contacts inside EPA that——

Mr. DIVER. Oh, at that point I think it would be fair to say that we assumed that—to get the answer to that question—somebody who knew people in the agency could get it much faster than we could get it, yes.

Mr. MOLINARI. And it proved to be correct, and he could get the answers to you quicker than you could get them?

Mr. DIVER. Weil, our not pursuing it, he did, obviously, get us the answer, the answer being that the policy had been misinterpreted by the person of another name.

Mr. MOLINARI. How often was Mr. Sanderson sought out to seek—to secure—answers for you, such as he did in this case?

Mr. DIVER. Twice he was sought out. Once, I believe, in September of 1982, he was asked to set up a meeting with a Chemical Waste Management person, with Mr. Eidsness. That's all he was asking, just, "Will you arrange my meeting with Mr. Eidsness?" Mr. Sanderson did not participate in the meeting. The only other connection was when he was asked to determine whether or not this information on the policy on ocean dumping was an accurate one. Those were the only two occasions on which his services were sought in connection with USEPA.

Mr. LEVITAS. Do you know if Rebecca Hamner participated in either of those meetings?

Mr. DIVER. I do not know.

Mr. LEVITAS. OK, let me finish this up.

Now, the last thing that I was asking you about was that October 12 meeting, and you explained what you think may be the tie-in with this Jack Anderson thing. And Mr. Bock has said he didn't know Mr. Sanderson. I'm going to ask the staff to see if we can locate that Jack Anderson column so that maybe we can fix a date on it some better. That might be of some value.

The last comment in here, just for the record—and your entertainment—is that Mr. Biros, as late as October 19 his notes say, "Deal smells as of now." So, I mean, that's the last page of his comments. He should have stuck around for a while.

Out at Denver, the Lowry mega-operation out there, in February 1982, did Waste Management or any of its facilities dispose of liquid toxic materials in a sanitary landfill during the period between the time EPA lifted its prohibition on such disposal and the time they reimposed it?

Mr. DIVER. Yes. Liquid igniteable waste, right.

Mr. LEVITAS. Did that occur—there was a few weeks in there where—as I recall, it was from February 25 to March 10——

Mr. DIVER. I can't verify what the dates are. What I can say is that when it happened, as we were getting near the end of 1981, USEPA had indicated to the parties in litigation that was pending in the Federal courts concerning the propriety of USEPA's May 19 regulations, USEPA had told a litigation conference that was attended by, among others, the Environmental Defense Fund, the Department of Justice, EPA, that it intended to postpone the applicable date of the deadline, banning the disposal of liquid igniteables. It did not, however, get around to doing that until—I trusting your recitation to me—February 1982. I think 1982; I don't recall the year. In any event, the general chronology was: EPA finally got around to doing that during that period of time following the suspension of that rule and the proposal of a new alternate rule. The Denver Arapahoe facility received and disposed of liquid igniteable waste and the rule was subsequently reinstated.

Mr. LEVITAS. Following some hearings that occurred in this very room.

Mr. DIVER. That may be. That may be. The rule was reinstated, but differently; there was a new definition of what constituted a liquid, and there was no further disposal of those materials. Yes, that did occur.

Mr. LEVITAS. Do you recall the date at which the disposal occurred and how, what quantity of material was disposed of?

Mr. DIVER. No. I don't recall the quantity.

Mr. LEVITAS. Would you supply that?

Mr. DIVER. But I do know—and I can state, because I was commissioned to investigate it some time ago—that there was no disposal prior to USEPA's suspending its rule.

Mr. LEVITAS. No, I'm not suggesting there was. I'll tell you what I am suggesting in a minute.

But I'd like to know the date and quantities of material that were disposed of during that period of time in February and March 1982, at the Lowry—I'll call it the Lowry—Denver Landfill.

Do you know where that material had been stored prior to its disposal?

Mr. DIVER. Some of the material was being stored at the site. Most of it came in during the period of time from the suspension to the time of its reinstatement.

Mr. LEVITAS. I've always had visions of all these barrels and drums——

Mr. DIVER. No. I know that is the way it was conveyed in the press. Unfortunately, it wasn't working that way; the material was not standing there on the site, most of it awaiting disposal, but some of it was at the storage facility, on site, not waiting for that but waiting to go through a decant system that was, at this point in time, being developed, and which was—we're talking about a period of time now, if I remember, in June 1982, the facility ceased receipt of further waste. So, we're talking about a period of time that was very close to the time the site actually ceased operation; that because of a Colorado Supreme Court decision that basically said that the city and county of Denver should have gone to Arapahoe County and amended its permit to allow the development of this hazardous waste facility, that that requirement was to be imposed on them in 1980 based on a 1981 law.

The Colorado Supreme Court having made that judgment, albeit we thought it was the wrong judgment, we thought it was not very likely that we were going to get it changed.

Mr. LEVITAS. Who were the individuals primarily responsible for applying for permits from EPA for permitted sites for hazardous waste disposal?

Mr. DIVER. For Chem Waste?

Mr. LEVITAS. Chem Waste or Waste Management.

Mr. DIVER. The environmental management departments of respective organizations have that permit application responsibility, which is very often done completely in-house but probably as many times and certainly even more complex permit applications outside consultants, engineering firms, are retained by the environmental management departments to provide assistance.

Mr. LEVITAS. Of each of the—of Chemical Waste and Waste Management?

Mr. DIVER. Yes. There is an environmental management department for Waste Management, Inc. and an environmental department for Chem Waste.

Mr. LEVITAS. And who occupied those positions during 1982?

Mr. DIVER. During 1982, they would have been basically the same person. In 1982, the function would have been through the environmental management department of Waste Management, Inc. All the applications would have gone through that channel. And at that time Peter Vardy would have been the vice president, Environmental Management.

Mr. LEVITAS. Mr. Molinari would like for me to expand my request about litigation information to include any pending State actions relating to environmental, all civil or criminal.

I have no further questions at this time. Let me express my appreciation to you, Mr. Diver and Mr. Bock, for your testimony today. It sheds some additional light on the subject of our inquiry. And I appreciate your responses to our questions and the information you have provided and that you are going to be providing.

As you know, we've got, still, a relatively long road ahead of us before we finish our recommendations. But at the end of the line, we expect to make some specific recommendations with respect to the Federal Government's handling of the hazardous waste contamination of water resources in this country, including legislative as well as military recommendations.

At a future meeting of this subcommittee on this matter, we expect to hear from Justice Department officials, and former Justice Department officials, and former EPA officials, including Carrol Dinkins, Steve Ramsey, Anne Burford, Robert Perry, Rita Lavelle, Mr. Ingell, Mr. Wood, Mr. Sanderson. And then, at the end of the process, we will, of course, be hearing from Mr. Lee Thomas who is the Assistant Administrator, OSWER, and Mr. William Ruckelshaus, the EPA Administrator.

But your testimony, I think, has played a very important role in helping us flesh out the picture as it was and as we are trying to get a handle on just what happened at Seymour and, hopefully, won't happen again anywhere, anytime.

And I submit for the record, without objection, a copy of the consent decree with the 24 companies of October 26, 1982, and the second amendment with those 55 new defendents.

[Information received follows:]

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA

FILED
Oct 26 12 26 PM '82
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

SEYMOUR RECYCLING CORPORATION;
ENVIRONMENTAL PROCESSING CORPORATION;
SEYMOUR MANUFACTURING CO., INC.;
CHEM-DYNE CORPORATION;
K.O.I. PETROLEUM COMPANY, INC.;
TRANSENVIRONMENTAL CORPORATION;
CITY OF SEYMOUR, INDIANA;
BOARD OF AVIATION COMMISSIONERS, Seymour, Indiana;
WILLIAM L. KOVACS;
BRUCE WHITTEN;
WILLIAM VANCE, in his capacity as receiver of Seymour Recycling Corporation;
JACK ZETTLER, in his capacity as receiver of Chem-Dyne Corporation, K.O.I. Petroleum Company, Inc., Transenvironmental Corporation;
INTERNATIONAL BUSINESS MACHINES CORPORATION;
GENERAL MOTORS CORPORATION;
E.I. du PONT de NEMOURS & COMPANY, INC.;
GENERAL ELECTRIC COMPANY;
PENNWALT CORPORATION;
WESTERN ELECTRIC COMPANY;
UNITED TECHNOLOGIES CORPORATION;
ATLANTIC RICHFIELD COMPANY;
BORG-WARNER CHEMICALS, INC.;
RCA CORPORATION;
BEMIS COMPANY, INC.;
FORD MOTOR COMPANY;
WHIRLPOOL CORPORATION;
MCDONNELL DOUGLAS CORPORATION;
DOW CORNING CORPORATION;
OWENS-ILLINOIS, INC.;
THE PROCTOR & GAMBLE COMPANY;
GENERAL AMERICAN TRANSPORTATION CORPORATION;
AMERICAN CAN COMPANY;
OLIN CORPORATION

Civil Action No.
IP-80-457-C

AM GENERAL CORPORATION;
CUMMINS ENGINE COMPANY, INC.;
NCR, CORP.;
WASTE RESOURCES OF TENNESSEE, INC.
(an affiliate of Chemical Waste Management, Inc.)

Defendants.

CONSENT DECREE

WHEREAS, the United States of America ("United States") filed a complaint in this case on May 9, 1980, under Section 7003 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6973, and Section 311 of the Clean Water Act ("CWA"), 33 U.S.C. § 1321, alleging, inter alia, the existence of an imminent and substantial endangerment to human health, welfare and the environment due to the handling, treatment, storage, transportation, disposal and presence of solid and hazardous wastes and other pollutants and contaminants ("Materials") at Freeman Field Industrial Park near Seymour, Indiana ("Seymour site"); and

WHEREAS, the United States filed an amended complaint on the 26th day of October, 1982, under Sections 106 and 107 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA"), 42 U.S.C. 9606, 9607, alleging, inter alia, that as responsible parties under CERCLA, those companies listed in Exhibit A hereto (hereinafter the "Companies") have created or contributed to the existence of an imminent and substantial endangerment to public health, welfare or the environment at the Seymour site and are thus

liable for abatement of the endangerment and for costs expended by the United States to abate the endangerment at the Seymour site; and

WHEREAS, the Companies deny responsibility for the disposal of materials at the Seymour site and deny any legal or equitable liability under any statute, regulation, ordinance or common law for any response costs or damages caused by storage, treatment, handling or disposal activities or actual or threatened release of materials at the Seymour site or by materials, if any, disposed of by the Companies to, through or at the direction of Seymour Recycling Corporation or any of the defendants in Civil Action No. IP-80-457-C; and

WHEREAS, (1) the United States, (2) the State of Indiana ("State"), and (3) the County of Jackson, Indiana, the City of Seymour, Indiana and the Board of Aviation Commissioners of the City of Seymour, Indiana (the latter three entities hereinafter the "local governments") desire to covenant not to sue, not to issue administrative orders or to execute judgment against the Companies for civil matters arising out of the transportation, storage, treatment, handling, disposal or presence of materials by the Companies at the Seymour site but not in such a way as to impair any claim which the United States or State may have against any other person or entity than the Companies; and

WHEREAS, it is not the intention of the United States or the State by entering into this Consent Decree to settle any

claim, or to covenant not to sue or issue administrative orders or not to execute judgment against any other persons or entities other than the Companies for liability arising under any statute or common law with respect to the transportation, storage, treatment, handling, disposal or presence of materials at the Seymour site; and

WHEREAS, it is the intention of the United States or the State to seek additional relief from persons or entities other than the Companies for costs incurred by the United States or the State and for injunctive or other relief to which the United States or the State may be entitled at law or equity arising out of and resulting from the transportation, storage, treatment, handling, disposal or presence of materials at the Seymour site to enable the United States and the State to recover the full relief available to them at law or equity from all parties who may be liable for cost recovery and injunctive or other relief at the Seymour site; and

WHEREAS, the parties recognize and intend to further hereby the public interest in avoiding prolonged and complicated litigation between the parties and to expedite the abatement of a portion of the imminent and substantial endangerment which is alleged to or may be presented at the Seymour site; and

WHEREAS, each undersigned representative of the parties to this Consent Decree certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Decree and to execute and to legally bind such party to this document.

Therefore, It is Ordered, Adjudged and Decreed:

I.

This Court has jurisdiction of this matter and of the parties consenting thereto.

II.

This Decree applies to and is binding upon the undersigned parties and their successors and assigns. The sole obligations and responsibilities of the Companies, other than Chemical Waste Management, Inc. (hereinafter "CWM"), under this Decree are set forth in Paragraphs III, XI, XIV, XV and XVII herein, and such Companies shall not have any further obligations or responsibilities with respect to the Seymour site other than those under the aforesaid provisions of this Decree. The obligations of CWM under this Decree are set forth in Paragraphs III-XI, XIV, XV and XVII.

III.

Within fifteen (15) days after the entry of this Decree, the Companies each shall pay to the Seymour Site Trust Fund (hereinafter the "Trust Fund") established at the Merchants National Bank & Trust Company in Indianapolis, Indiana the sum which is shown for that Company in Exhibit A hereto, which payment is not a penalty. One or more of the Companies listed in Exhibit A hereto shall serve as Trustees of the Trust Fund.

IV.

The Trustees shall use the money in the Trust Fund to pay CWM to perform the Work described in Exhibit B hereto (hereinafter referred to as the "Work"), which Exhibit is hereby incorporated by reference and made a part of this Consent Decree as though it were set forth verbatim. CWM shall be responsible for completion of the Work; and, CWM agrees to assume, and does assume, any and all liability arising out of its acts or omissions in the performance of the Work or its failure to satisfactorily and fully perform and complete the Work as defined in Exhibit B hereto. CWM shall purchase a performance bond in the amount of $15 million dollars, which bond shall assure complete performance of the Work. In event of default the bond shall provide that the Work shall be satisfactorily and fully completed and in no event shall the bond authorize the surety to avoid its obligations to have the work fully completed. CWM shall purchase and maintain in force insurance policies which shall fully protect the United States, the State and the public against any and all liability arising out of its acts or omissions in the performance of the Work. The insurance policies and the performance bond shall contain coverage of the type and in the amounts shown in Exhibits C and D hereto, which coverage has been approved by the United States and the State.

V.

Subject to obtaining the appropriate federal, state and local permits, CWM shall commence the Work not later than the 30th (thirtieth) day after entry of this Decree and CWM shall undertake and complete the Work expeditiously in accordance with the standards, specifications and the schedule of completion set forth in Exhibit B.

VI.

No variance shall occur in performance of the Work from the standards, specifications, or schedule of completion contained in Exhibit B without prior written approval by the United States after written notification by CWM to the United States, the State and the Trustees of the nature of and reason for any such requested variance. CWM shall be responsible for obtaining all federal, state or local permits and complying with all applicable federal, state or local laws governing the performance of the Work, including the transportation and disposal of the Materials. CWM shall provide the Court, the United States and the State with a written status report on the progress and completion of the Work every 30 days until the Work is completed.

VII.

CWM shall be liable for stipulated penalties in the amount of $1,000 (one thousand dollars) for each day on which it fails to complete the performance of the Work in accordance

with Exhibit B. Any failure of CWM to complete the Work which results from circumstances beyond the control of CWM shall not be deemed to be a violation of its obligation and shall not make CWM liable for the stipulated penalties. To the extent delay is caused by such circumstances, the time for performance hereunder shall be extended.

CWM shall immediately notify the United States, the State and the Trustees of any delay which occurs in the performance of the Work. Such notification shall be in writing and shall fully describe the nature of the delay, the reasons therefor, the expected duration of the delay, the actions which will be taken by CWM to mitigate further delay and whether the delay may in the opinion of CWM cause or contribute to an endangerment to public health, welfare or the environment. If CWM fails to provide the notice required by this paragraph to the United States it may not receive any extension of time under this decree.

In the event CWM and the United States and the State cannot agree that the time for performance shall be extended, CWM must submit the question to the Court for resolution within a reasonable time or waive its right to receive any such extension. Increased costs or expenses in connection with the performance of the Work shall not constitute a circumstance beyond CWM's control.

VIII.

The United States, the State and their authorized representatives shall have access to the Seymour site at all times until such time as the Work is completed. The United States Environmental Protection Agency (EPA) may designate an on scene coordinator (osc) to observe and monitor the progress of the Work. The osc shall have the authority vested by 40 C.F.R. 300 et seq.; 47 Fed. Reg. 31180 July 16, 1982, including authority to require CWM to cease performance of the Work, any portion thereof, or any other activity at the Seymour site which in the opinion of the osc, may or does present or contribute to an endangerment to public health, welfare or the environment or cause or threaten the release of Materials from the site. In the event the osc does require such cessation of work, the osc then shall have the authority to require CWM to perform the Work consistent with Exhibit B in accordance with the instructions of the osc to avoid or mitigate the endangerment which he believes may occur. If CWM objects to any order requiring cessation of the Work or to any order to perform the Work in accordance with the instructions of the osc, it may petition to the Court to stay or set aside the order of the osc. With respect to the subject matter of this paragraph EPA retains all rights under applicable statute or regulations.

IX.

Until such time as the Work is completed, the United States and the State or their representatives (including the

osc) shall have access to the site for the sampling of wastes at the site and to conduct investigations relating to soil and groundwater contamination beneath or near the Seymour site. In conducting such activities the United States or the State or their representatives shall avoid interference with CWM's performance of the Work. CWM agrees to cooperate with the United States and the State by promptly making available to them all information obtained during the performance of the Work by CWM including information relating to the source and identification of Materials removed from the Seymour site. CWM also agrees to preserve all records related to the Seymour site cleanup, including sampling analysis, chain of custody records, manifests, trucking logs, receipts, reports, traffic routing, destination of Materials, correspondence or other documents produced during the Work at the Seymour site and agrees further that it shall make available such documents, along with access to employees with knowledge of relevant facts concerning the performance of the Work for purposes of investigation, information gathering or testimony related to the Work and Materials found at the Seymour site.

CWM agrees to cooperate with representatives of the United States and the State to permit such representatives to take samples including split samples at all locations whether samples are taken at such locations by CWM or not. Sampling and analysis shall be done by all parties pursuant to EPA protocols. Arrangements for such samples shall be made by the osc.

CWM agrees that samples taken shall be handled according to accepted chain of custody procedures established by the National Enforcement Investigation Center to be provided to CWM by the United States. Before disposal of any samples by CWM, the EPA shall be given thirty days notice and opportunity to take possession of these samples.

X.

CWM shall notify the United States and the State in writing upon the completion of the Work. The Work shall be deemed to be completed when pursuant to the scope of Work in Exhibit B, all materials have been disposed of or treated in accordance with all federal, state and local laws and regulations. Nothing in this decree shall release CWM from liability arising out of or relating to the transportation, treatment, handling, disposal, storage, or releases or threatened releases of Materials at, to, from or near the Seymour site resulting from its performance of the Work. The United States and the State shall review the Work and indicate their agreement or disagreement as to its satisfactory completion within thirty (30) days of receipt of the notification. If neither the United States nor the State advises CWM in writing of any disagreement concerning the completeness of the Work performed within such thirty (30) day period, it shall be deemed that such Work has been completed in full compliance with this decree and the United States and the State shall send a letter to CWM confirming in writing that the Work has been completed.

If the United States or the State believes that the Work has not been completed in accordance with the standards and specifications set out in Exhibit B, they shall notify CWM in writing of what they believe should be done to complete the Work making reference to specific portions of Exhibit B attached hereto and proposing a schedule for completion. If CWM does not object to the corrective measures proposed by the United States or the State within thirty (30) days thereafter, CWM shall expeditiously undertake and complete such measures in accordance with the proposed schedules of completion. If CWM objects to such proposed corrective measures, CWM shall notify the United States and the State within 30 days thereafter of its objections and the reasons therefor. In the event the parties cannot resolve any dispute over whether the Work has been successfully and fully completed, CWM shall submit such dispute to the Court for resolution within 30 days. Failure of CWM to submit such a dispute to the Court shall mean that CWM waives its objections and CWM shall expeditiously undertake and complete the proposed corrective measures in accordance with the schedule of completion.

XI.

The Companies agree that they will each preserve, pending further court order, all records and documents in their possession or the possession of any of their divisions, employees, agents, accountants or attorneys, which relate to any transactions or business with,

or relate in any other way to Seymour Recycling Corporation or associated parties or the Seymour site, despite any document retention policy to the contrary. The term "associated parties" shall be defined as Seymour Manufacturing Company, Chem-Dyne Corporation, Spray-Dyne Corporation, Transenvironmental Corporation, K.O.I. Petroleum Company, Inc., Bruce A. Whitten, and William L. Kovacs. Notwithstanding any other provision of this decree, the United States retains whatever rights it may have under applicable statutes and regulations, governing the collection of records and documents, which is the subject matter of this paragraph, and the Companies retain whatever rights they may have to object to any requests for records and documents.

XII.

To avoid litigation between the parties hereto and the expense that would be incurred in connection with such litigation, and to set to rest forever the differences existing among them, without impairing or affecting the claims of the United States, the State and the local governments against any other person or entity in connection with the Seymour site, the United States, the State and the local governments do hereby covenant not to sue, execute judgment or take any civil judicial or administrative action under common law (federal or state), State and municipal law including ordinances of Jackson County, the City of Seymour or the Seymour Aviation Board, and the following federal statutes: Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 et

seq. (CERCLA); Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA); Clean Water Act, 33 U.S.C. § 1251 et seq. (CWA); The Clean Air Act, 42 U.S.C. 7401 et seq. (CAA); Toxic Substances Control Act, 15 U.S.C. 2601 et seq. (TSCA); Safe Drinking Water Act, 42 U.S.C. 300f. et seq. (SDWA); Federal Insecticide, Fungicide and Rodenticide Act, 7 U.S.C. 136 et seq. (FIFRA); the Refuse Act 33 U.S.C. 407, and any statutes administered or enforced by EPA, against the Companies, their subsidiaries, divisions, parents, affiliates or their respective directors, officers, employees, agents, successors and assigns, arising out of or related to the storage, treatment, handling, disposal, transportation or presence or actual or threatened release or discharge of any materials at, to, from or near the Seymour site, including any action with respect to surface cleanup and soil or groundwater cleanup at the Seymour site. This covenant not to sue, execute judgment or take other action includes all civil legal and administrative costs incurred by the United States, the State and the local governments with respect to matters which are the subject of this consent decree.

It is expressly understood that the United States, the State and the local governments covenant not to sue, execute judgment, or take any civil, judicial or administrative action against the Companies under common law (federal or state), or federal law, state law or municipal law including ordinances of Jackson County, the City of Seymour and the Seymour Aviation Board for causes of action relating to injury to, destruction

of or loss of natural resources of the United States, within the meaning of CERCLA, 42 U.S.C. § 9601 et seq., under the jurisdiction of the United States Department of Interior, arising out of or related to the storage, treatment, handling, disposal, transportation, presence, or actual or threatened release or discharge of any materials at, to, or from or near the Seymour site.

The matters which are the subject of this covenant not to sue or execute judgment contained in this decree are referred to hereafter as "Covered Matters."

Nothing herein shall be construed to release CWM from any continuing liability at law for its failure to perform the Work in accordance with Exhibit B.

To the extent that the law of the State of Indiana may be determined to control and govern the interpretation of this Consent Decree, the parties do not intend that this paragraph shall be a general, unqualified release as that term is defined by Indiana law. The parties intend that this paragraph shall be construed to be a covenant not to sue, execute judgment or take any civil judicial or administrative action against only the Companies which are listed in Exhibit A hereto. The parties agree that the successful completion of the Work by CWM does not represent full satisfaction of all claims for relief to which the United States or the State or local governments may be entitled at law or equity against persons or entities other than the Companies arising out of or relating to the storage, treatment, handling, transportation, disposal or presence or actual

or threatened release or discharge of any materials at, to from or near the Seymour site. The parties contemplate and intend that the United States or the State will assert claims for cost recovery, injunctive or other relief against entities which are not parties to this consent decree to enable the United States and the State to recover the complete relief to which they may be entitled at law or equity. To this end, nothing herein is intended to release any claims, causes of action, or demands in law or equity against any person or entity not a party to this Consent Decree for any liability they may have arising out of or relating in any way to the storage, treatment, handling, disposal, transportation, presence or actual or threatened release or discharge of any materials at, to, from or near the Seymour site.

XIII.

This consent decree was negotiated in good faith by the parties and the United States, the State, and the local governments believe that each of the individual Company's payments described in Exhibit A attached hereto represent a fair and equitable apportionment of each company's responsibilities for Covered Matters. In addition, the United States, the State and the local governments believe that the combined payments of the Companies in Exhibit A represent a fair and equitable apportionment of those Companies' responsibilities for Covered Matters.

Accordingly, the United States and the State intend and believe that each and all of the Companies should not be liable with respect to "Covered Matters" for any payment in excess of the amount paid or commitments made pursuant to this consent decree and agree that this consent decree will be dispositive of each and all of the Companies' duties and liabilities with respect to any other person or entity against whom a claim is made by the United States or the State, or a judgment is rendered in favor of the United States or the State for Covered Matters. To this end, the parties intend to protect each and all of the Companies from being required to pay any amounts for covered matters in excess of the amounts paid pursuant to paragraph III above; to obviate the necessity and expense of having the Companies be or remain parties of record or participate in a suit relating to their liability for "Covered Matters" for the purpose of determining whether they or any of them may be a joint tortfeasor or otherwise additionally liable for "Covered Matters"; to recognize and further the important public policy of settling potential disputes amicably without resort to lengthy litigation, thus expediting the necessary cleanup of the Seymour site; and to protect the rights of the United States and the State from infringement by any person or entity not a party to this Consent Decree. If in any action brought by the United States or the State with respect to Covered Matters, or in any other action arising out of any claim

brought by the United States or the State for Covered Matters any court of competent jurisdiction enters a final judgment requiring that one or more of the Companies must pay sums for Covered Matters in addition to those paid by each such Company pursuant to this Consent Decree, then the United States and/or the State will adjust the total of all such judgments obtained against any other person or entity so that no Company shall be required to pay all or any part of said sum.

XIV.

The Companies agree not to assert any causes of action, claims or demands against the United States or the State including the Hazardous Substances Response Fund with respect to matters arising out of or relating to the storage, handling, disposal, treatment, transportation or presence or actual or threatened release or discharge of any materials at the Seymour site under the statutes, ordinances or common law referred to in paragraph XII herein. However, the Companies reserve against the United States and the State (but not the Hazardous Substances Response Fund), the right to assert any claim, defense or cause of action arising out of or relating to actions taken by the United States or the State at the Seymour site during or after the performance of the Work.

XV.

Each Company agrees that in any suit or claim for contribution brought against it for Covered Matters it will timely

notify the United States and the State of the institution of any such suit or claim, and it will co-operate with the United States in any such suit or claim.

XVI.

The United States, the State, the local governments and the Companies, in entering into this Decree and in order to facilitate a mutually satisfactory and immediate cleanup of the Seymour site, do not admit, accept, or intend to acknowledge any liability or fault by any party hereto with respect to any matter arising out of or relating to the Seymour site. This express denial of any and all liability or fault attaches to any and all matters relating to or arising out of the Seymour site.

XVII.

When notification to the United States is required by the terms of this decree it shall be in writing addressed to: A) Office of Regional Counsel, Region V, United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604; and B) Chief, Environmental Enforcement Section,

United States Department of Justice, Land and Natural Resources Division, Ninth and Pennsylvania Avenue, N.W., Washington, D.C. 20530.

The United States, the State, the local governments and the Companies consent to this decree by their duly authorized representative on this 26th day of October, 1982.

THE UNITED STATES OF AMERICA

By: Carol E. Dinkins
CAROL E. DINKINS
Assistant Attorney General
Land and Natural Resources Division
United States Department of Justice
Washington, D. C. 20530

By: Sara Evans Barker
SARA EVANS BARKER
United States Attorney
274 United States Courthouse
46 East Ohio Street
Indianapolis, Indiana 46204

By: Robert M. Perry
Robert M. Perry
Associate Administrator for
Legal and Enforcement Counsel
and General Counsel

By: Valdas V. Adamkus
Valdas V. Adamkus
Regional Administrator
EPA, Region V

The State consents to this Decree dated OCTOBER 26, 1982, by its Governor on this 22nd day of October, 1982.

STATE OF INDIANA

By: Robert D. Orr
ROBERT D. ORR
GOVERNOR

Approved by:

Linley E. Pearson
LINLEY E. PEARSON
Attorney General of Indiana

October 22, 1982
DATE

The City of Seymour consents to the attached Consent Decree by its duly authorized official on this 25 day of October, 1982.

By Charles Parker
Mayor

The Board of Aviation Commissioners of the City of Seymour consents to the attached Consent Decree by its duly authorized official on this 25 day of October, 1982.

By: _____
Title: PRESIDENT

The County of Jackson consents to the attached Consent Decree by its duly authorized official on this 26th day of October, 1982.

_____
John F. Rothring, Attorney for the
Board of Commissioners of the County
of Jackson, State of Indiana
115 West Tipton Street
P.O. Box 824
Seymour, IN 47274
(812) 522-2550

The International Business Machines Corporation consents to this Decree by its duly authorized representative on this 22nd day of October, 1982.

INTERNATIONAL BUSINESS MACHINES
CORPORATION

By: _____
John F. Williams
IBM Vice President and
President, Real Estate and
Construction Division

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. IP-80-457-C
	)	
SEYMOUR RECYCLING CORPORATION, ET AL.,	)	
	)	
	)	
Defendants	)	

The General Motors Corporation consents to this Decree by its duly authorized representative on this 25th day of October, 1982.

By: _____
GENERAL MOTORS CORPORATION
Leonard F. Charla, Attorney

The E. I. du Pont de Nemours & Company Incorporated consents to this Decree by its duly authorized representative on this 26 Th day of October, 1982.

By: _____

E. I. DU PONT DE NEMOURS & COMPANY
N. PAPPAS, VICE PRESIDENT
POLYMER PRODUCTS DEPARTMENT

General Electric Company consents to this Decree by its duly authorizeo representative on this 20th day of October, 1982.

By: _____

General Electric Company
James R. Donnalley,
Vice President - Corporate
Environmental Programs

The Western Electric Company, Incorporated consents to this Decree by its duly authorized representative on this 26th day of October, 1982.

By: _____

F. C. CHILDS
General Solicitor

WESTERN ELECTRIC COMPANY, INCORPORATED
222 Broadway
New York, New York 10038

United Technologies Corporation, by its duly authorized representative, consents to this Consent Decree.

UNITED TECHNOLOGIES CORPORATION

By: _____

Timothy A. Vanderver, Jr.
Patton, Boggs & Blow
2550 M Street, N. W.
Washington, D. C. 20037
Attorney for United
Technologies Corporation

Dated October 25, 1982

Atlantic Richfield Company consents to this Decree by its duly authorized representative on this 15th day of October, 1982.

By: _____

ATLANTIC RICHFIELD COMPANY
John E. G. Bischof
Vice President and Counsel of
ARCO Metals Company, a division
of Atlantic Richfield Company

Borg-Warner Corporation consents to this Decree by its duly authorized representative on this 21st day of October, 1982.

BORG-WARNER CORPORATION

By: _____
Russell J. Parsons
Senior Vice President

The RCA Corporation consents to this Decree by its duly authorized representative on this 19th day of October, 1982.

By: _____
RCA Corporation
Daniel B. Beresford
Staff Vice President and
Senior Counsel

National Cash Register (NCR) Corporation consents to this decree, by its duly authorized representative, on this 19th day of October, 1982.

By: _____
JOHN R. CROMER, Counsel for Natior
Cash Register Corporation
HAMMOND CROMER JACKSON & BORGMANN
431 East Hanna Avenue
Indianapolis, IN 46227
317/786-0487

The Bemis Company, Inc. consents to this Decree by its duly authorized representative on this 25th day of October, 1982.

BEMIS COMPANY, INC.

By: _____
C. W. Andrews, Vice President

The Ford Motor Company ~~Corporation~~ consents to this Decree by its duly authorized representative on this 21st day of October, 1982.

D. E. JOLLIFFE ASSISTANT SECRETARY

By: [redacted]
(Company Name)
(Name and title of person signing)

Whirlpool Corporation consents to this Decree by its duly authorized representative on this 19th day of October, 1982.

By: Frank C Harter
WHIRLPOOL CORPORATION
Frank C. Harter, Attorney

McDonnell Douglas Corporation consents to this Decree by its duly authorized representative on this 18th day of October 1982.

By: John T Sant
McDonnell Douglas Corporation
John T. Sant
Corporate Vice President
General Counsel

The Dow Corning Corporation consents to this Decree by its duly authorized representative on this 19th day of October, 1982.

By: _____
James R. Jenkins
Secretary and General Counsel
Dow Corning Corporation

The Pennwalt Corporation consents to this Decree by its duly authorized representative on this 19th day of October, 1982.

Pennwalt Corporation

By: _____
George Heath, Jr.
Manager, Legal Department and
Assistant Secretary

The OWENS-ILLINOIS Corporation consents to this Decree by its duly authorized representative on this 22 day of October, 1982.

By: _____
Owens-Illinois, Inc.
Russell C. Berkoben
Vice President/General Manager

The Procter & Gamble Company consents to this Decree by its duly authorized representative on this 19th day of October, 1982.

By _____
The Procter & Gamble Company
Powell McHenry
Vice President-General Counsel

The General American Transportation Corporation consents to this Decree by its duly authorized representative on this 19th day of October, 1982.

JMG:lw

The American Can Company consents to this Decree by its duly authorized representative on this 20th day of October, 1982.

American Can Company

By: _____
Timothy G. Rogers
Counsel, Environmental
and Energy Law

Olin Corporation consents to this Decree by its duly authorized representative on this 19th day of October, 1982.

OLIN CORPORATION

By: _____
J. V. Johnstone
President, Chemicals Group

AM General Corporation consents to this Decree by its duly authorized representative on this 19th day of October, 1982.

By: James F Holden
AM General Corporation
James F. Holden
Chief Counsel and
Corporate Secretary

CONSENT

The Cummins Engine Company, Inc. consents to this Decree by its duly authorized representative on this 20th day of October, 1982.

CUMMINS ENGINE COMPANY, INC.

By: Ted L Marston
Ted L. Marston
Vice President -
Personnel

WASTE RESOURCES OF TENNESSEE, INC. consents to this Decree by its duly authorized representative on this 19th day of October, 1982.

WASTE RESOURCES OF TENNESSEE, INC.

By: John B Furman
John B. Furman, Assistant Secretary

Chemical Waste Management, Inc. (an affiliate of Waste Resources of Tennessee, Inc.) consents to this Decree by its duly authorized representative on this 21st day of October, 1982.

BY: Frank R. Krohn

FRANK R. KROHN
VICE PRESIDENT

The foregoing Consent Decree, with Exhibits A, B, C, and D incorporated therein and attached hereto, is hereby adopted and entered in this cause, United States of America v. Seymour Recycling Corp., et al., Number IP 80-457-C, this 8th day of December, 1982.

William E. Steckler

United States District Judge

Oct 26 9-06 F. '8

EXHIBIT A

List of Companies Contributing to Trust Fund

International Business Machines Corporation	$2,241,001
General Motors Corporation	1,032,961
E.I. du Pont de Nemours & Company, Inc.	682,805
General Electric Company	665,297
Western Electric Company, Inc.	385,172
United Technologies Corporation	350,156
Atlantic Richfield Company on behalf of The Anaconda Company, Anaconda Wire & Cable Company, Anaconda Aluminum Company, Anaconda Industries, and Anaconda Magnet Wire	245,109
Borg-Warner Chemicals, Inc.	245,109
RCA Corporation	175,078
Bemis Company Inc.	175,078
Ford Motor Company	175,078
Whirlpool Corporation	140,062
McDonnell Douglas Corporation	105,047
Dow Corning Corporation	105,047
Pennwalt Corporation	100,000
Owens-Illinois, Inc.	100,000
The Procter & Gamble Company	100,000
General American Transportation Corporation	100,000
American Can Company	100,000
Olin Corporation	100,000
AM General Corporation	100,000
Cummins Engine Company Inc.	100,000
NCR, Corp.	100,000
Waste Resources of Tennessee, Inc. (an affiliate of Chemical Waste Management, Inc.)	100,000
	$7,723,000

EXHIBIT C

Oct 25 9:17 P.M.

The insurance policies, which CWM shall purchase and maintain in effect shall contain coverage for no less than:

a) Worker's Compensation - Coverage A - Statutory

Coverage B (Employer's Liability) - $500,000

b) Public Liability

Bodily Injury -	$500,000/occurrence $500,000 aggregate
Property Damage -	$500,000/occurrence $500,000 aggregate

c) Automobile Liability

Bodily Injury -	$500,000/person $500,000/accident
Property Damage -	$500,000/accident

d) Umbrella Liability

Bodily Injury and Property Damage Combined
$50,000,000/occurrence
$50,000,000 aggregate

Coverage under Umbrella Liability policy applies excess of the limits specified in Coverage B of a), and b) and c) above, and includes coverage for pollution liability from sudden occurrences.

e) Environmental Impairment Liability (Non-Sudden Occurrences)

Bodily Injury and Property Damage Combined
$30,000,000/claim
$60,000,000 aggregate

With respect to CWM insurance policies in existence at the time of execution of this Consent Decree, such insurance policies have been reviewed by and approved by the United States. Certificates of insurance for renewal of CWM insurance

policies and binders evidencing renewal shall be forwarded to the United States prior to the expiration date of each insurance policy, and shall be subject to the approval of the United States, which approval shall not be unreasonably withheld.

Copies of renewal policies shall be available for inspection by the United States. Each policy shall contain a provision whereby the insurer agrees not to cancel, terminate, or fail to renew the policy without sixty (60) days prior written notice to the United States and the State.

EXHIBIT D

Performance Bond

Oct 26 9 [illegible] '82

Bond No. _____ Amount $15,000,000

KNOW ALL MEN BY THESE PRESENTS,

That we, CHEMICAL WASTE MANAGEMENT, INC., (hereinafter called the "Principal"), as Principal, and the FEDERAL INSURANCE COMPANY, of Short Hills, New Jersey, a corporation duly organized under the laws of the State of New Jersey, (hereinafter called the "Surety"), as Surety, are held and firmly bound unto the UNITED STATES OF AMERICA and the STATE OF INDIANA (hereinafter called the "Obligees"), in the sum of Fifteen Million Dollars ($15,000,000), for the payment of which sum well and truly be made, we, the said Principal and the said Surety, bind ourselves, our heirs, executors, administrators, successors and assigns, jointly and severally firmly by these presents.

Sealed with our seals and dated this _____ day of _____, A.D. nineteen hundred and _____ ____.

THE CONDITION OF THIS OBLIGATION IS SUCH, that whereas the Principal entered into the Consent Decree with the Obligees to which this Performance Bond is attached, and has agreed to perform the work described in Exhibit B of this Consent Decree, which is hereby referred to and made a part hereof as if fully set forth herein;

NOW, THEREFORE, THE CONDITION OF THIS OBLIGATION IS SUCH, that if the above bounden Principal shall well and truly keep, do and perform each and every, all and singular, the matters and things in said Exhibit B set forth and specified to be by said Principal kept, done and performed, at the times and in the manner in said Exhibit B specified, or shall pay over, make good and reimburse to the above named Obligees, all loss and damage which said Obligees may sustain by reason of failure or default on the part of said Principal so to do, then this obligation shall be null and void; otherwise shall remain in full force and effect.

NOTWITHSTANDING the above, it is expressly understood that in the event of default, the Surety shall satisfactorily and fully complete the work described in Exhibit B, and in no event shall the Surety be authorized to avoid its obligation to have the work in Exhibit B completed. Such obligation to complete the work shall be limited, however, to the penal sum of the Bond in the aggregate for both Obligees.

signed original in CWM file

_____
Principal

By: _____

FEDERAL INSURANCE COMPANY

By: _____

and _____ _____

countersigned

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	IP-80-457-C
SEYMOUR RECYCLING CORPORATION;	)	
ENVIRONMENTAL PROCESSING CORPORATION;	)	
SEYMOUR MANUFACTURING CO., INC.;	)	
CHEM-DYNE CORPORATION;	)	
K.O.I. PETROLEUM COMPANY, INC.;	)	
TRANSENVIRONMENTAL CORPORATION;	)	
CITY OF SEYMOUR, INDIANA;	)	
BOARD OF AVIATION COMMISSIONERS, Seymour, Indiana;	)	
WILLIAM L. KOVACS;	)	
BRUCE WHITTEN;	)	
WILLIAM VANCE, in his capacity as receiver of Seymour Recycling Corporation;	)	
JACK ZETTLER, in his capacity as receiver of Chem-Dyne Corporation, K.O.I. Petroleum Company, Inc., Transenvironmental Corporation;	)	
STANLEY BIRGE, SR.;	)	
STANLEY BIRGE, JR.;	)	
CLIFFORD BIRGE;	)	
WILLIS HOBSON;	)	
HAROLD S. HOBSON;	)	
MONSANTO COMPANY;	)	
CARSTAB CORPORATION;	)	
KENDALL COMPANY;	)	
JONES CHEMICALS, INC.;	)	
MOBIL CHEMICAL COMPANY;	)	
INMONT CORPORATION;	)	
LENK MANUFACTURING COMPANY;	)	
GUARDSMAN CHEMICALS, INC.;	)	
PHELPS DODGE INDUSTRIES, INC.;	)	
PB&S CHEMICAL COMPANY, INC.;	)	
KENTUCKY ELECTRONICS CORPORATION;	)	
CONTRACTORS UNITED, INC.;	)	
STEWART-WARNER CORPORATION;	)	
UNITED STATES STEEL CORPORATION;	)	
ASHLAND OIL, INC.;	)	
MULLER INDUSTRIES;	)	
ANGELL MANUFACTURING COMPANY;	)	
GLOBE UNION CORPORATION;	)	
LAKEWAY CHEMICALS COMPANY;	)	

VELSICOL CHEMICAL CORPORATION;
DAYTON PRESS, INC.;
NATICO, INC.;
CLOUDSLEY COMPANY;
HAAS CABINET CO., INC.;
A.O. SMITH CORPORATION;
TECHNICAL PRODUCTS, INC.;
MANVILLE CORPORATION;
COLUMBIA ORGANICS CORPORATION;
PORTER PAINT COMPANY;
SARKES TARZIAN, INC.
EGYPTIAN LACQUER MFG CO., INC.
UNION CARBIDE CORPORATION;
HUDSON WIRE COMPANY;
SUPERIOR OIL COMPANY, INC.;
IVC INDUSTRIAL COATINGS, INC.;
EMCONITE CORPORATION;
BLATZ PAINT COMPANY;
REYNOLDS METALS CORPORATION;
AM GREETINGS COMPANY;
E.H. MARCUS PAINT COMPANY;
MULTI-CHEM CORPORATION;
FERRO CORPORATION;
EMERY INDUSTRIES;
AURORA CASKET COMPANY, INC.;
BURKE-HALL CORPORATION;
KLOR-KLEEN, INC.;
DRESSER INDUSTRIES;
JELLICO, INC.;
CUSTOM INDUSTRIAL CORPORATION;
FOSTER TRANSFORMER CORPORATION
(Seymour Electronics Division);
INTERNATIONAL BUSINESS MACHINES
CORPORATION;
GENERAL MOTORS CORPORATION;
E.I. du PONT de NEMOURS & COMPANY, INC.;
GENERAL ELECTRIC COMPANY;
PENNWALT CORPORATION;
WESTERN ELECTRIC COMPANY;
UNITED TECHNOLOGIES CORPORATION;
ATLANTIC RICHFIELD COMPANY;
BORG-WARNER CHEMICALS, INC.;
RCA CORPORATION;
BEMIS COMPANY, INC.;
FORD MOTOR COMPANY;
WHIRLPOOL CORPORATION;
MCDONNELL DOUGLAS CORPORATION;
DOW CORNING CORPORATION;

OWENS-ILLINOIS, INC.;
THE PROCTOR & GAMBLE COMPANY;
GENERAL AMERICAN TRANSPORTATION CORPORATION;
AMERICAN CAN COMPANY;
OLIN CORPORATION
AM GENERAL CORPORATION;
CUMMINS ENGINE COMPANY, INC.;
NCR CORPORATION;
WASTE RESOURCES OF TENNESSEE, INC. (an affiliate of Chemical Waste Management, Inc.),

Defendants.

SECOND AMENDED COMPLAINT

The United States of America at the request and on behalf of the Administrator of the United States Environmental Protection Agency ("EPA") alleges that:

1. This is a civil action for injunctive relief and recovery of costs and natural resource damage, instituted pursuant to Section 7003 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6973, and Sections 106(a) and 107 of the Comprehensive Environmental Response Compensation and Liability Act ("CERCLA" or "Superfund"), 42 U.S.C. §9606(a) and §9607. The United States seeks injunctive relief to remedy an imminent and substantial endangerment to human health and the environment arising out of the storage, treatment, handling, disposal, transportation, presence, release or threatened release of solid wastes and/or hazardous substances at a thirteen acre site located on G Avenue, West Freeman Field in Seymour, Indiana, ("hereafter "the Seymour site"). The United States also seeks to recover monies expended for response, remedial and investigative

activities at the site, for reimbursement of costs incurred by Plaintiff under Section 311 of the Clean Water Act ("CWA"), 33 U.S.C. §1321, and for damage to natural resources in and around the site.

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§1331(a), 1345, 33 U.S.C. §1321(n), 42 U.S.C. §6973 and 42 U.S.C. §§9606, 9607 and 9613.

3. Venue is proper in this district pursuant to 28 U.S.C. §1391(b) and (c), and 42 U.S.C. §9613(b), because the claims arose and the damages and releases occurred in this district, and because one or more of the defendant corporations are incorporated in, and are licensed to do business in Indiana.

4. The State of Indiana has intervened in this action.

5. The defendants denominated in paragraphs 6 through 17 below are hereinafter referred to as "the Original Defendants." The Defendants denominated in paragraphs 18 through 22 below are hereinafter referred to as "the Board of Director Defendants." The Defendants denominated in paragraphs 23 through 72 are hereinafter referred to as the "Non-Settling Defendants." The Defendants denominated in paragraphs 73 through 96 are hereinafter referred to as the "Settling Generator Defendants."

6. Seymour Recycling Corporation ("SRC") is a corporation organized and existing under the laws of the State of Indiana, and was engaged in the storage, treatment, recycling and disposal of waste chemicals at the Seymour site.

7. Environmental Processing Corporation is a corporation organized and existing under the laws of the State of Indiana.

Since December 31, 1978, this company has owned all of the shares of stock of SRC.

8. Seymour Manufacturing Co., Inc. is a corporation organized and existing under the laws of the State of Indiana. It is or has been engaged in the disposal of waste chemicals at the Seymour site.

9. Chem-Dyne Corporation at the time of the filing of the original Complaint in this action was a corporation organized and existing under the laws of the State of Ohio. It has provided sales, marketing, engineering and analytical services to SRC, and has caused the transportation, storage and disposal of waste chemicals at the Seymour site. Since February 4, 1980, it has been under the control of Jack A. Zettler, appointed Receiver by the Butler County, Ohio Court of Common Pleas.

10. Transenvironmental Corporation at the time of the filing of the original Complaint in this action was a corporation organized and existing under the laws of the State of Ohio. It has provided equipment and personnel for the transportation of chemicals to and from SRC. Since February 4, 1980, it has been under the control of Receiver Jack A. Zettler.

11. K.O.I. Petroleum Company, Inc., at the time of the filing of the original Complaint in this action was an Ohio corporation which at all times relevant marketed chemicals which passed through the Seymour site and was associated with chemicals transported to and disposed of at the Seymour site. Since February 4, 1980, Jack Zettler has been the Receiver of the K.O.I. Petroleum Company, Inc.

12. City of Seymour is a political subdivision of the State of Indiana, organized, established and existing by virtue of Indiana Code 18-1-1.5 et seq., which conveys the power to establish airports (Indiana Code 18-1-1.5-14). The City of Seymour is the owner of the real property upon which the SRC conducted its business.

13. Board of Aviation Commissioners, Seymour, Indiana, is a board of the City of Seymour, Indiana, organized, established and existing under Indiana Code 19-6-1-1 et seq. The Board of Aviation Commissioners of the City of Seymour has the power to sue and be sued in the name of its municipality under Indiana Code 19-6-1-2. It has the power to lease property under Indiana Code 19-6-1-6. The Board of Aviation Commissioners of the City of Seymour, Indiana, leased the Seymour site to SRC and to its predecessor in interest, the Seymour Manufacturing Corporation.

14. William L. Kovacs was at all relevant times a director, incorporator and stockholder of Environmental Processing Corporation. He has held various executive positions with some of the corporations listed above including president of SRC and vice-president of Chem-Dyne Corporation. He has exercised control over operations at the Seymour site. In 1980 William L. Kovacs filed for bankruptcy.

15. Bruce Whitten was at all relevant times president of the Chem-Dyne Corporation, a major stockholder and/or officer in SRC, Environmental Processing Corporation, Transenvironmental Corporation and K.O.I. Petroleum Company, Inc. and exercised control over operations at the Seymour site.

16. William Vance is the Receiver appointed by the Jackson County Indiana Circuit Court on February 25, 1980, to take control of SRC. Defendant Vance is sued in his official capacity only and not as an individual.

17. Jack Zettler is the Receiver for Chem-Dyne Corporation, K.O.I. Petroleum Company, Inc., and Transenvironmental Corporation. He is sued in his official capacity only and not as an individual.

18. Stanley Birge, Sr., at all times relevant has been a major stockholder in and member of the board of directors of Seymour Manufacturing Co., Inc., and a major stockholder and member of the board of directors of SRC from the time of its incorporation until about the time of the sale the SRC stock in 1978 to Environmental Processing Corporation. He has exercised control over operations at the Seymour site.

19. Stanley Birge, Jr., was at all times relevant a major stockholder in and member of the board of directors of Seymour Manufacturing Co., Inc., and a major stockholder and member of the board of directors of SRC from the time of its incorporation until about the time of the sale the SRC stock in 1978 to Environmental Processing Corporation. He has exercised control over operations at the Seymour site.

20. Clifford Birge was at all times relevant a major stockholder in and member of the board of directors of Seymour Manufacturing Co., Inc., and a major stockholder and member of the board of directors of SRC from the time of its incorporation until about the time of the sale the SRC stock in 1978 to Environmental Processing Corporation. He has exercised control over operations at the Seymour site.

21. Harold S. Hobson was at all times relevant a major stockholder in and member of the board of directors of Seymour Manufacturing Co., Inc., and a major stockholder and member of the board of directors of SRC from the time of its incorporation until about the time of the sale the SRC stock in 1978 to Environmental Processing Corporation. He has exercised control over operations at the Seymour site.

22. Willis Hobson was at all times relevant a major stockholder in and member of the board of directors of Seymour Manufacturing Co., Inc., and a major stockholder and member of the board of directors of SRC from the time of its incorporation until about the time of the sale the SRC stock in 1978 to Environmental Processing Corporation. He has exercised control over operations at the Seymour site.

23. Monsanto Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

24. Carstab Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

25. Kendall Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or

possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

26. Jones Chemicals, Inc. is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

27. Mobil Chemical Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

28. Inmont Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

29. Lenk Manufacturing Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

30. Guardsman Chemicals, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

31. Phelps Dodge Industries, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

32. PB&S Chemical Company, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

33. Kentucky Electronics Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

34. Contractors United, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

35. Stewart-Warner Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

36. United States Steel Corporation is a person who arranged for, contributed to, and caused the disposal or treatment

at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

37. Ashland Oil, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

38. Muller Industries is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

39. Angell Manufacturing Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

40. Globe Union Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

41. Lakeway Chemicals Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

42. Velsicol Chemical Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

43. Dayton Press, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

44. Natico, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

45. Cloudsley Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

46. Haas Cabinet Co., Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

47. A.O. Smith Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the

Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

48. Technical Products, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

49. Manville Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

50. Columbia Organics Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

51. Porcer Paint Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

52. Sarkes Tarzian, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

53. Egyptian Lacquer Mfg. Co., Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

54. Union Carbide Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

55. Hudson Wire Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

56. Superior Oil Company, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

57. IVC Industrial Coatings, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

58. Emconite Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or

possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

59. Blatz Paint Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

60. Reynolds Metals Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

61. AM Greetings Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

62. E.H. Marcus Paint Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

63. Multi-Chem Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

64. Ferro Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

65. Emery Industries is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

66. Aurora Casket Company, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

67. Burke-Hall Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

68. Klor-Kleen, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

69. Dresser Industries is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour

site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

70. Jellico, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

71. Custom Industrial Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

72. The Seymour Electronics Division of Foster Transformer Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

73. International Business Machines Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

74. General Motors is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

75. E.I. DuPont de Nemours & Company, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

76. General Electric Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

77. Pennwalt Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

78. Western Electric is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

79. United Technologies Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

80. Atlantic Richfield Company is a person who arranged for, contributed to, and caused the disposal or treatment at the

Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

81. Borg-Warner Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

82. RCA Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

83. Bemis Company, Inc., is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

84. Ford Motor Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

85. Whirlpool Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

86. McDonnell Douglas Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

87. Dow Corning Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

88. Owens-Illinois, Inc. is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

89. Proctor & Gamble Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

90. General American Transportation Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

91. American Can Company is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour

site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

92. Olin Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

93. AM General Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

94. Cummins Engine Company, Inc. is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

95. National Cash Register Corporation is a person who arranged for, contributed to, and caused the disposal or treatment at the Seymour site of solid waste and hazardous substances owned or possessed by it, within the meaning of 42 U.S.C. §§9607(a)(3) or (4) and 42 U.S.C. §6973.

96. Waste Resources of Tennessee, Inc., a subsidiary of Chemical Waste Management, Inc., is a corporation that generated and/or caused to be transported solid and hazardous wastes and hazardous substances to the Seymour site for handling, storage, treatment, or disposal.

97. "Person" is defined in CERLA §101(21), 42 U.S.C. §9601(21), as "an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a state, or any interstate body," and in RCRA §1004(15), 42 U.S.C. §6903(15) as "an individual, trust, firm, joint stock company, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body."

98. "Hazardous waste" is defined in RCRA §1004(5), 42 U.S.C. §6903(5), as:

> [a] solid waste, or combination of solid wastes, which because of its quality, concentration, or physical, chemical, or infectious characteristics may:
>
> (A) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or
>
> (B) pose a substantial present or potential hazard to human health or the environmental when improperly treated, stored, transported, or disposed of, or otherwise managed.

99. "Solid waste" is defined in RCRA §1004(27), 42 U.S.C. §6903(27) as,

> any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved

> materials in irrigation return flows or industrial discharges which are point sources subject to permits under section 402 of the Federal Water Pollution Control Act, as amended (86 Stat. 880) [33 USCS § 1342], or source, special nuclear, or byproduct material as defined by the Atomic Energy Act of 1954, as amended (68 Stat. 923) [42 USCS §§ 2011 et seq.].

100. "Hazardous substance" is defined in CERCLA §101(14), 42 U.S.C. §9601(14), to mean, in pertinent part:

> . . . (A) any substance designated pursuant to section [311(b)(2)(A) of the Clean Water Act] . . . (C) any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act . . . (D) any toxic pollutant listed under section [307(a) of the Clean Water Act] . . . (E) any hazardous air pollutant listed under Section [112 of the Clean Air Act] . . . .

101. "Release" is defined in CERCLA §101(22), 42 U.S.C. §9601(22), to mean, in pertinent part, ". . . any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting escaping, leaching, dumping, or disposing into the environment."

102. "Disposal" is defined in RCRA §1004(3), 42 U.S.C. §6903(3), as

> . . . the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

103. "Facility" is defined in CERCLA §101(9), 42 U.S.C. §9601(9), as

> any building, structure, installation, equipment pipe or pipeline (including any pipe into a sewer or publicly owned treatment

> works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or air-craft, or (b) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

104. "Natural resources" are defined in CERCLA §101(16), 42 U.S.C. §9601(16), as "land, fish, wildlife, biota, air, water, ground water, drinking water supplies, and other such resources belonging to, managed by, held in trust by, appertaining to, or otherwise controlled by the United States, ..., any State or local government, or any foreign government."

105. Seymour Recycling Corporation (SRC) operated a facility for the recycling, treatment and disposal of solid and hazardous wastes and hazardous substances from about July 1976 through February 1980 at a site located on approximately a thirteen acre site at G Avenue West, Freeman Field, in Jackson County, Indiana (Seymour or SRC site). The site is part of an industrial park owned by the City of Seymour, Indiana, and is located about two miles to the southwest of the City.

106. The SRC facility was previously operated by Seymour Manufacturing Company, Inc. (SMC) through its Chemical Division. SMC commenced operation of the facility shortly after obtaining a lease for use of the property on or about August 27, 1969. Upon information and belief, SMC entered the business of recycling, treating and disposing of hazardous wastes and substances sometime during 1968 at a separate facility in Seymour, Indiana. SMC transferred equipment, materials, personnel and operatons from this separate facility to the present SRC site after obtaining the lease.

107. SMC continuously operated a facility for the recycling, treatment and disposal of solid and hazardous wastes and hazardous substances at the SRC site from a time shortly after the date of its leasing of the site until about July 6, 1976. On or about July 7, 1976, SMC spun off its Chemical Division and created Seymour Recycling Corporation. The stockholders and Board of Directors of SMC and SRC remained the same.

108. Upon information and belief, the SMC lease was assigned and transferred to SRC with the approval of the Board of Aviation Commissioners on or about the time of SRC's incorporation. At all times during the operation of the SRC facility by SMC and SRC, the site was leased to SMC or SRC by the City of Seymour, Indiana, Board of Aviation Commissioners.

109. SMC and SRC during the course of their business accumulated solid and hazardous wastes and hazardous substances on the SRC site. These wastes continued to accumulate throughout both their operations, and by the time the facility ceased active operation in 1980, approximately 50,000 drums and 100 bulk tanks and other containers containing solid and hazardous wastes and hazardous substances had accumulated on the SRC site. These containers were exposed to the elements. Under these conditions, the containers rapidly deteriorated, releasing solid and hazardous wastes and hazardous substances into the environment.

110. Upon information and belief, SMC and SRC during their operations at the site caused the dumping, leaking, spilling, releasing and other disposing of chemicals, solid wastes, hazardous wastes and hazardous substances into the environment,

including the air, land and water. Upon information and belief, defendants Kovacs, Whitten, Stanley Birge, Sr., Stanley Birge, Jr., Clifford Birge, Willis Hobson and Harold Hobson when acting in their official capacities, had knowledge of and permitted and allowed the releases and threatened releases of solid wastes and hazardous substances to continue at the site.

111. The soil underlying the site is porous and sandy so that there is no impermeable barrier on the Seymour site to prevent spilled solid wastes and hazardous substances from contaminating the groundwater, which in the shallow aquifer underlying the site moves generally to the north-west.

112. There are residential dwellings approximately 3000 feet north-west of the site that have shallow drinking water wells. There are also various industries nearby which use deeper wells.

113. On or about March 18, 1980, several chemicals designated as hazardous substances in 40 C.F.R. 116, pursuant to Section 311 of the Clean Water Act, were found in a ditch outside the north fence of the 13-acre site which leads to a stream. This stream ("Heddy Run") is a tributary of the East Fork of the White River, a navigable water of the United States.

114. Immediately after drums at the site began to smoke on March 28, 1980, the United States Regional Response Team ("RRT") took emergency action under Section 311 of the CWA, 33 U.S.C. §1321.

115. The United States has incurred costs for the discovery, investigation and evaluation of hazardous substances located at or released from the SRC facility and for the containment,

treatment and disposal of such substances and other removal or remedial actions not inconsistent with the National Contingency Plan, as adopted pursuant to Section 311(c)(2) of the CWA, 33 U.S.C. §1321(c)(2) and revised pursuant to section 105 of CERCLA, 42 U.S.C. §9605. The United States will continue to incur such response costs releated to the SRC facility, including but not limited to soil, groundwater, and wildlife investigations and studies.

116. Pursuant to a consent decree between the settling generators and the United States, which has been approved by the Court in this case, defendant Chemical Waste Management has removed all drums and tanks from the SRC facility and will soon complete removal of some contaminated soils from the site in accordance the decree.

117. Solid and hazardous wastes and hazardous substances released from the facility will remain in the environment after completion of the work by Chemical Waste Management under the consent decree. The remaining wastes and substances continue to present an imminent and substantial endangerment to public health or the environment. Upon information and belief, these remaining wastes or substances include materials, the disposal or treatment of which at the SRC site was arranged for, contributed to and caused by the Non-Settling Defendants.

FIRST CLAIM FOR RELIEF

118. The United States realleges paragraphs 1 through 117.

119. Section 7003 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6973, provides that the Adminis-

trator of EPA may bring suit for appropriate relief upon receipt of evidence that the handling, storage, treatment, transportation or disposal of any solid or hazardous wastes may present an imminent and substantial endangerment to health or the environment.

120. Because defendants have contributed to the handling, storage, transportation, disposal or treatment of solid or hazardous wastes at the Seymour site in a manner that presents or may present an imminent and substantial endangerment to public health and welfare and the environment within the meaning of 42 U.S.C. §6973, all defendants other than the Settling Generator Defendants should be immediately restrained to take all action necessary to effectuate a comprehensive and complete cleanup of all solid wastes and hazardous wastes currently disposed at the Seymour site.

SECOND CLAIM FOR RELIEF

121. The United States realleges paragraphs 1 through 117.

122. Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. §9606(a), provides in pertinent part:

> In addition to any other action taken by a State or local government, when the President determines that there may be an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance from a facility, he may require the Attorney General of the United States to secure such relief as may be necessary to abate such danger or threat, and the district court of the United States in the district in which the threat occurs shall have jurisdiction to grant such relief as the public interest and the equities of the case may require.

The President's functions under §106(a) have been delegated to the Administrator of the Environmental Protection Agency. Executive Order 12316, August 14, 1981.

123. The Administrator has determined that there may be, and there is in fact, an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of hazardous substances from the Seymour facility.

124. In order to abate such damages, the public interest and equities require that all defendants other than the Settling Generator Defendants be required to take all steps necessary to effectuate a comprehensive and complete cleanup of all remaining hazardous substances and other contaminants that have been released from the Seymour facility into the environment.

THIRD CLAIM FOR RELIEF

125. The United States realleges paragraphs 1 through 118.

126. Under Section 311(c)(1) of the Clean Water Act, 33 U.S.C. §1321(c)(1), "[w]henever any oil or a hazardous substance is discharged or there is a substantial threat of such discharge into or upon the navigable waters of the United States ... the President is authorized to act to remove or arrange for the removal of such oil or substance at any time, unless he determines such removal will be done properly by the owner or operator of the ... onshore facility...."

127. Section 311(f)(2) of the Clean Water Act, 33 U.S.C. §1321(f)(2) provides that "... an owner or operator of an onshore facility...shall be liable to the United States Government for the actual costs incurred under subsection (c) of this section for the removal of [hazardous] substance[s] by the United States Government in an amount not to exceed $50,000,000...."

128. At relevant times, hazardous substances were discharged from the Seymour site and there was a substantial threat of such discharges into and upon navigable waters of the United States, in violation of Section 311(b)(3) of the Clean Water Act, 33 U.S.C. §1321(b)(3).

129. The Original Defendants and the Board of Directors Defendants are owners and/or operators of an onshore facility within the meaning of Section 311(a)(10), 33 U.S.C. §1321(a)(10), that is, "any facility...of any kind located in, on, or under, any land within the United States...."

130. During 1980 and 1981 the United States incurred costs in actions taken pursuant to Section 311(c), 33 U.S.C. §1321(c), that exceed $1.8 million. The Original Defendants and the Board of Directors Defendants are liable to the United States for all these costs.

FOURTH CLAIM FOR RELIEF

131. The United States realleges paragraphs 1 through 118.

132. The United States has incurred costs and expended monies to protect human health, welfare and the environment from the discharge of pollutants from the Seymour site. This expenditure improved the condition and value of the premises.

133. If the Original Defendant corporations are not ordered to repay this sum to the United States they will be unjustly enriched.

FIFTH CLAIM FOR RELIEF

134. The United States realleges paragraphs 1 through 118.

135. Section 107(a) of CERCLA, 42 U.S.C. §9607(a), provides, in pertinent part, as follows:

> Notwithstanding any other provision or rule of law, and subject only to the defenses set forth in subsection (b) of this section --
>
> (1) the owner and operator of a ... facility,
>
> (2) any person who at the time of disposal of any hazardous substance owned or operated any facility at which such hazardous substances were disposed of,
>
> (3) any person who by contract, agreement, or otherwise arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person, by any other party or entity, at any facility owned or operated by another party or entity and containing such hazardous substances, and
>
> (4) any person who accepts or accepted any hazardous substances for transport to disposal or treatment facilities or sites selected by such person, from which there is a release, or a threatened release which causes the incurrence of response costs, of a hazardous substance, shall be liable for --
>
> (A) all costs of removal of remedial action incurred by the United States Government or a State not inconsistent with the national contingency plan;
>
> (B) any other necessary costs or response incurred by any other person consistent with the national contingency plan; and
>
> (C) damages for injury to destruction, or loss of natural resources, including the reasonable costs of assessing such injury, destruction, or loss resulting from such a release.

136. The United States has incurred and will continue to incur response costs not inconsistent with the National Contingency Plan, including the costs of removal and remedial actions as defined in Sections 101(23), 101(24) and 101(25) of CERCLA, and costs authorized by Section 104 of CERCLA, to respond to the hazard

created by the release or threatened release of hazardous substances at the Seymour site. Injury to, destruction of, and loss of natural resources held in trust by the President or state or local governments have occurred and will continue to occur as a result of such releases.

137. All defendants other than the Settling Generator Defendants are liable to the United States for all response costs, including the costs of removal and remedial actions, incurred in the past or to be incurred in the future to respond to the hazard created by the release and threatened release of hazardous substances from the Seymour site, and are liable to the United States for damage to natural resources resulting from such releases.

PRAYER FOR RELIEF

Wherefore, Plaintiff, United States of America, prays:

(A) That the Court issue a permanent injunction ordering all defendants other than the Settling Generator Defendants to undertake such action as may be necessary to remedy the conditions which may cause, contribution to or present an imminent and substantial endangerment at the Seymour site arising out of or relating in any way to the storage, treatment, handling, disposal, presence, release or threatened release of solid wastes or hazardous substances; and

(B) That the United States of America recover from all defendants other than the Settling Generator Defendants

(i) all funds expended by it for all cleanup, removal and remedial actions

and other enforcement activities related to the site;

(ii) a dollar sum to be proved at trial for natural resource damage in and around the site; and

(iii) its costs of suit.

Respectfully submitted,

F. HENRY HABICHT, II
Assistant Attorney General
Land and Natural Resources Division
United States Department of Justice
Washington, D.C. 20530

SARA EVANS BARKER
United States Attorney
274 United States Court House
46 East Ohio Street
Indianapolis, Indiana

CHARLES GOODLOE, JR.
Assistant United States Attorney
Indianapolis, Indiana

ROBERT D. DANIEL
JAMES M. SPEARS
Special Litigation Counsel
Land and Natural Resources Division
United States Department of Justice
10th and Pennsylvania Avenue, N.W.
Washington, D.C. 20530
Telephone: (202) 633-2724/2756

OF COUNSEL:

LAWRENCE W. KYTE
MARY GADE
Attorneys, Region V
United States Environmental
Protection Agency
230 S. Dearborn Street
Chicago, Illinois 60604

JERRY SCHWARTZ
Attorney
United States Environmental
Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Mr. LEVITAS. If there is no further business to come before the subcommittee, the subcommittee stands adjourned subject to the call of the Chair.

[Whereupon, at 4:12 p.m., the hearing was adjourned, subject to the call of the Chair.]

○